

EXHIBIT B

Office of the Attorney General
Attn: Kimberly Massicotte, Esq.
165 Capitol Avenue
Hartford, CT 06106

March 22, 2021
Invoice # 375860
Matter # 081979.0001

Re: State of Connecticut Opioid Litigation

For services rendered through February 28, 2021

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
02/25/21	Stafstrom	Telephone calls with Attorney General team regarding Purdue bankruptcy case	0.60	261.00
02/25/21	Goldman	Microsoft Teams meeting with State team in Purdue bankruptcy regarding overview of case and issues	0.60	339.00
02/26/21	Goldman	Review of Purdue Pharma bankruptcy docket to familiarize myself with chronology of case and players (.4), review of Debtors' motion to extend exclusive period and draft and transmit email regarding same to State Attorney General attorneys (.4); collect/review bankruptcy case authorities regarding trustee or DIP assuming unlimited or extended statute of limitation of government creditor in bringing fraudulent transfer claims under state law (.7)	1.50	847.50
02/26/21	Goldman	Collect recent SDNY bankruptcy decisions and other bankruptcy decisions dealing with standards for third party releases	0.50	282.50

Fees **\$1,730.00**

Professional Summary

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Irve J. Goldman	Partner	2.60	565.00	1,469.00
Steven J. Stafstrom	Partner	0.60	435.00	261.00

Fees **\$1,730.00**

Connecticut law requires us to advise you that this communication is an attempt to collect a debt.

Total Fees	\$1,730.00
Total Disbursements	\$0.00
Total Due This Invoice	\$1,730.00

Office of the Attorney General
Attn: Kimberly Massicotte, Esq.
165 Capitol Avenue
Hartford, CT 06106

April 22, 2021
Invoice # 377149
Matter # 081979.0001

Re: State of Connecticut Opioid Litigation

For services rendered through March 31, 2021

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
03/04/21	Goldman	Detailed review of Purdue Pharma bankruptcy case docket and select important case pleadings and orders for review	1.00	565.00
03/05/21	Goldman	Review select pleadings/orders in Purdue Pharma bankruptcy case to familiarize myself with case and players	1.20	678.00
03/08/21	Goldman	Continued review of pleadings/orders in Purdue Pharma bankruptcy case	1.30	734.50
03/14/21	Stafstrom	Telephone call with Mr. Goldman and AG Team regarding bankruptcy strategy (.5); briefly review executive summary of disclosure statement (.5)	1.00	435.00
03/14/21	Goldman	Conference call with Assistant AGs and Mr. Stafstrom regarding opposing extension of preliminary injunction (.5); locate and forward SDNY decision affirming Judge Drain's issuance of preliminary injunction and review of decision (1.0)	1.50	847.50
03/15/21	Goldman	Conference call with Kim Massicotte and Steve Stafstrom regarding status of position of State's on continuation of preliminary injunction, cull through docket to obtain prior objections of Ad Hoc Committee and current motion to continue preliminary injunction	1.00	565.00
03/15/21	Goldman	Review of non-consenting states' objections to initial motion for preliminary injunction and telephone conferences with Andrew Tropp regarding background, issues and strategy	2.50	1412.50
03/15/21	Stafstrom	Telephone call with Ms. Massicotte regarding objection and discussion of strategy relative to same with Mr. Goldman	0.50	217.50
03/16/21	Goldman	Complete review of initial oppositions of Ad Hoc	1.50	847.50

Connecticut law requires us to advise you that this communication is an attempt to collect a debt.

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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
		Committee of Non-Consenting States to motion for preliminary injunction and review of draft opposition prepared by Massachusetts		
03/16/21	Goldman	Review of Purdue plan of reorganization and begin work on objection to continuation of preliminary injunction	2.50	1412.50
03/17/21	Goldman	Work on opposition to motion to extend preliminary injunction	5.50	3107.50
03/18/21	Goldman	Review of email of Jim Donahue with list of issues and Teams meeting with Kim Massicotte and Matt Fitzsimmons regarding same (1.0); check Bankruptcy Code and send follow up email to Kim Massicotte regarding class voting (.2)	1.20	678.00
03/18/21	Goldman	Begin review of Disclosure Statement and locate bankruptcy case authorities on unfair discrimination	1.00	565.00
03/18/21	Stafstrom	Telephone call with AG Team regarding strategy for objection	0.50	217.50
03/19/21	Goldman	Partial review of disclosure statement in anticipation of having to object to plan; review of non-consenting states objection to extension of preliminary injunction	1.50	847.50
03/23/21	Goldman	Review of motion to establish confirmation protocols and conference call with State AG team regarding issues and strategy for objection to disclosure statement	1.20	678.00
03/23/21	Goldman	Continued review of Purdue Pharma disclosure statement; locate/collect pertinent bankruptcy case authorities regarding separate classification of groups of unsecured claims for possible objection to disclosure statement/plan and check legal basis for claimed non-dischargeability of DOJ criminal fine	2.00	1130.00
03/24/21	Goldman	Continued review of disclosure statement and locate/review case authorities on potential objections that can be asserted	3.00	1695.00
03/25/21	Goldman	Complete review of disclosure statement with notations of areas for objection and begin drafting outline of areas for potential objection to disclosure statement	3.50	1977.50
03/25/21	Hancock	Assist Mr. Goldman in providing research under Section 145 of Delaware law regarding director and officer indemnification issues	0.40	174.00
03/26/21	Goldman	Complete preparation of confidential memo regarding potential objections to disclosure statement of Purdue Pharma	5.00	2825.00
03/29/21	Goldman	Research/locate bankruptcy case authority regarding issue of whether officer/director claims of indemnity can be subject to equitable disallowance or equitable subordination as means of challenging third party releases	1.00	565.00

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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
03/30/21	Goldman	Further research/review of case authorities on equitable subordination or equitable disallowance of officer/director indemnity claims based on misconduct and classification and unequal treatments of unsecured creditors	2.50	1412.50
03/31/21	Goldman	Review of and make revisions to Common Interest Agreement and provide to AG group	0.80	452.00

Fees **\$24,039.50**

Professional Summary

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Irve J. Goldman	Partner	40.70	565.00	22,995.50
Nancy A. D. Hancock	Partner	0.40	435.00	174.00
Steven J. Stafstrom	Partner	2.00	435.00	870.00

Fees **\$24,039.50**

Total Fees **\$24,039.50**
Total Disbursements **\$0.00**

Total Due This Invoice **\$24,039.50**

Office of the Attorney General
Attn: Kimberly Massicotte, Esq.
165 Capitol Avenue
Hartford, CT 06106

May 17, 2021
Invoice # 378105
Matter # 081979.0001

Re: State of Connecticut Opioid Litigation

For services rendered through April 30, 2021

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
04/02/21	Goldman	Locate/review bankruptcy case authorities on permissibility of separate classification of unsecured creditors in plan and propriety of delegating claim allowance to private trust under plan	1.50	847.50
04/05/21	Goldman	Review of States' proof of claim and attachment and conference call with State AGs regarding update on disclosure statement/plan discussions among NCSG	1.20	678.00
04/05/21	Goldman	Organize/segregate additional research for objections to disclosure statement/plan	0.50	282.50
04/05/21	Goldman	Begin review of NCSG comments to disclosure statement	0.70	395.50
04/06/21	Goldman	Review of States' proof of claim documentation and calculate value of claims of non-consenting states not in favor of plan	0.80	452.00
04/22/21	Goldman	Review of Purdue Pharma case docket for status of case and review of United States trustee objection to disclosure statement	1.00	565.00
04/28/21	Goldman	Review case activity in Purdue Pharma bankruptcy and select objections to disclosure statement in preparation for Teams status meeting with Matt Fitzsimmons	1.00	565.00
04/29/21	Goldman	Review of non-consenting state's objection to disclosure statement and Teams meeting with Matt Fitzsimmons re: status update	1.50	847.50

Fees

\$4,633.00

Connecticut law requires us to advise you that this communication is an attempt to collect a debt.

Professional Summary

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Irve J. Goldman	Partner	8.20	565.00	4,633.00
	Fees			\$4,633.00
	Total Fees			\$4,633.00
	Total Disbursements			\$0.00
	Total Due This Invoice			\$4,633.00

Office of the Attorney General
Attn: Matthew Fitzsimmons, Esq.
165 Capitol Avenue
Hartford, CT 06106

June 11, 2021
Invoice # 379227
Matter # 081979.0001

Re: State of Connecticut Opioid Litigation

For services rendered through May 31, 2021

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
05/11/21	Goldman	Update research on third party releases in Chapter 11 plan and check Purdue Pharma case docket for status	0.50	282.50
05/21/21	Goldman	Check status of Purdue Pharma case and review amended order establishing confirmation protocols and order establishing terms for mediation	0.50	282.50

Fees **\$565.00**

Professional Summary

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Irve J. Goldman	Partner	1.00	565.00	565.00

Fees **\$565.00**

Total Fees **\$565.00**
Total Disbursements **\$0.00**

Total Due This Invoice **\$565.00**

Connecticut law requires us to advise you that this communication is an attempt to collect a debt.

Office of the Attorney General
Attn: Matthew Fitzsimmons, Esq.
165 Capitol Avenue
Hartford, CT 06106

July 21, 2021
Invoice # 380679
Matter # 081979.0001

Re: State of Connecticut Opioid Litigation

For services rendered through June 30, 2021

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
06/09/21	Goldman	Review of document requests and collect/review select case authorities on common interest/joint defense privilege	2.50	1412.50
06/11/21	Goldman	Search for and locate discovery objection based on proportionality under FRCP 26(b), locate and provide selected secondary sources regarding objecting document requests and SDNY decision discussing proportionality under FRCP 26(b) for objections to Sackler document requests	1.00	565.00
06/17/21	Goldman	Conference call with Matt Fitzsimmons and Sara Nadin regarding discovery and confirmation objection	0.50	282.50
06/28/21	Goldman	Telephone conference with Matt Fitzsimmons regarding getting back involved in Purdue Pharm case and preparing objection to confirmation (.4); review of Purdue Pharm docket to get up to speed in case; identify and review Second Amended Confirmation Protocol Order and Order Approving Disclosure Statement to get a handle on case deadlines; identify older select proceedings for review and review of non-consenting states objection to disclosure statement (2.3)	2.70	1525.50
06/29/21	Goldman	Review of non-consenting states' objection to first preliminary injunction, expert report submitted by non-consenting states, and letter to Judge McMahon requesting joint tribunal	2.00	1130.00
06/30/21	Goldman	Review of UST and select objections to initial disclosure statement in anticipation of preparing objection to confirmation (.3); receipt and review of Judge McMahon response to attorney request for joint tribunal (.1); receive e-mail request from Matt Fitzsimmons regarding appeal bond question (.2);	2.00	1130.00

Connecticut law requires us to advise you that this communication is an attempt to collect a debt.

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<u>Date</u>	<u>Professional</u>	<u>Hours</u>	<u>Amount</u>
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locate/review bankruptcy case authority on appeals
of confirmation orders and setting amount of bond
and draft and transmit e-mail to Matt Fitzsimmons
regarding same (1.4)

Fees	\$6,045.50
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Professional Summary

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Irve J. Goldman	Partner	10.70	565.00	6,045.50

Fees	\$6,045.50
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Total Fees	\$6,045.50
Total Disbursements	\$0.00

Total Due This Invoice	\$6,045.50
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Office of the Attorney General
Attn: Matthew Fitzsimmons, Esq.
165 Capitol Avenue
Hartford, CT 06106

August 24, 2021
Invoice # 381928
Matter # 081979.0001

Re: State of Connecticut Opioid Litigation

For services rendered through July 31, 2021

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
07/01/21	Goldman	Review 2nd amended annotated complaint in State Court action forwarded by Sara Nadim (2.5); locate/review bankruptcy decisions holding that state consumer protection claims within the meaning of Bankruptcy Code section 362(b)(4) (.5)	3.00	1695.00
07/02/21	Goldman	Review of Stamford Advocate article on FDA regulation of Purdue Pharma's marketing of oxycontin	0.20	113.00
07/02/21	Goldman	Receipt/review of e-mail from Matt Fitzsimmons regarding status of mediation and expected areas [REDACTED] going forward with objection to confirmation; locate/review of case authority on factors for equitable mootness of appeal of confirmation order, how to seek direct appeal to second circuit and principle of substance not giving away to form relative to plan permission forcing releases of claims against Sacklers and nullifying state court actions against them, when section 362(b)(4) excepts police power claims from automatic stay and 28 USC section 1412 prevents removal of such claims to bankruptcy court (1.9); draft and transmit responsive e-mail to Matt Fitzsimmons (.2)	2.50	1412.50
07/07/21	Goldman	Work up general outline of confirmation objections in preparation for call with Matt Fitzsimmons and Sara Nadim, conference call with Matt Fitzsimmons and Sara Nadim regarding confirmation objections (1.0); research applicability of 28 USC Sec. 959 to post-confirmation/plan implementation (.5); Teams meeting with Matt Fitzsimmons, Sara Nadim and Washington Assistant AG and counsel regarding confirmation objections (1.3)	2.80	1582.00

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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
07/07/21	Goldman	Further research/collection of cases on when bankruptcy pre-emption of state law is found and cases holding pre-Code law continues to apply to B. Code relative to Supreme Court decision in Colloway v. Benton ruling that 3rd party release is beyond subject matter jurisdiction of Bankruptcy Court; telephone conference with Matt Gold, outside counsel for State of WA, regarding coordinating filing of confirmation objections	2.00	1130.00
07/08/21	Goldman	Prepare outline of potential objections to confirmation per request of Matt Fitzsimmons and exchange of email correspondence with Attorney Fitzsimmons regarding [REDACTED] objection (1.2); review of Mediators Report filed July 7, 2021 (.3); research, locate and review bankruptcy case authorities regarding bankruptcy court subject matter jurisdiction relative to issue third-party releases (1.5)	3.00	1695.00
07/09/21	Goldman	Research/locate and review decisions on 1129(a)(1) as applied to third party releases and other provisions of Title 11, and on nature of claims brought by State under CUTPA as sovereign claims and begin drafting objections to confirmation	4.50	2542.50
07/12/21	Goldman	Teams meeting with Matt Fitzsimmons and group regarding status of confirmation objection (.5); review of material/case law forwarded by Matt Fitzsimmons [REDACTED] regarding confirmation objections (1.0); work on objection to confirmation (4.0)	5.50	3107.50
07/13/21	Goldman	Work on objection to confirmation	6.50	3672.50
07/14/21	Goldman	Work on objection to confirmation	6.00	3390.00
07/15/21	Goldman	Work on objection to confirmation; exchange of emails with Matt Fitzsimmons throughout day regarding various confirmation and logistical issues; telephone conference with Matt Gold representing Washington regarding exchange of information/law for our respective objections; review of NY Times article on Sacklers [REDACTED]	6.00	3390.00
07/16/21	Goldman	Telephone conference with Matt Fitzsimmons regarding status of objection to confirmation and inserting other States' consumer protection laws and complete preparation of marked and final, clean versions of objection to confirmation	5.00	2825.00
07/17/21	Goldman	Work on changes/additions to objection to confirmation	1.50	847.50
07/18/21	Goldman	Receive email from Matt Fitzsimmons regarding joinder pleading for [REDACTED]	1.00	565.00
07/19/21	Goldman	Work throughout day to incorporate [REDACTED] into objection to confirmation, make changes to objection in response to comments from AG's office and joint objections, and otherwise finalize objection for filing; telephone conferences with Matt Gold,	5.50	3107.50

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
		Matt Fitzsimmons and Andrew Troop regarding [REDACTED] and getting master service list and supervise filing and service of objection; locate and provide Matt Fitzsimmons [REDACTED] and discuss deadlines under confirmation protocol order		
07/20/21	Goldman	Review of US Attorney and US Trustee objections to confirmation	1.20	678.00
07/20/21	Goldman	Receive and exchange emails with Davis Polk regarding call with objecting states and exchange of emails with Matt Fitzsimmons and Matt Gold regarding coordination call	0.30	169.50
07/21/21	Goldman	Review of WA and MD objections to confirmation in preparation for coordination call with objecting states (1.0); participate in coordination call and discussion with Matt Gold afterwards (1.5); telephone conference with Matt Fitzsimmons regarding thoughts/issues from coordination call with objecting states (.5)	3.50	1977.50
07/21/21	Goldman	Conference call with Davis Polk attorneys and objecting State representatives regarding choreography of confirmation hearing	1.20	678.00
07/22/21	Goldman	Teams coordination meeting with objecting states regarding witness and exhibit lists and approval for confirmation hearing; review of MD discovery list; exchange of emails with Matt Gold, et al regarding MD's approach for listing exhibits	1.50	847.50
07/22/21	Goldman	Receipt/review Matt Gold email regarding special committee reports, check/review disclosure statement treatment of settlement and draft and transmit responsive email to Matt Gold	0.80	452.00
07/22/21	Goldman	Teams meeting with objecting States' Attorneys General regarding coordinating for confirmation hearing	1.00	565.00
07/23/21	Goldman	Review of Examiner's Report (.5); exchange of email correspondence with Matt Fitzsimmons regarding [REDACTED] (.5); research regarding judicial notice of deferred prosecution agreement and facts contained therein (.5); Teams coordination meeting with objecting States Attorneys General (1.0); WebX meeting with US Attorneys and objecting states, telephone conference with Matt Gold regarding observations about meeting and coordinating filing of joint witness and exhibit lists; telephone conference with Matt Fitzsimmons regarding status of preparations (1.5)	4.00	2260.00
07/23/21	Goldman	Review of NCSG expert report regarding Sackler wealth and redlined changes in 6th and 7th amended plan and begin digest of important decisions for argument	1.00	565.00

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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
07/26/21	Goldman	Review of Matt Gold's draft of exhibit list; telephone conference with Matt Gold regarding explanation of some of items added to list; receive, review and provide comments to updated list	1.50	847.50
07/26/21	Goldman	Review of additional pleadings/declarations added by Matt Gold to exhibit list, telephone conferences with Matt Gold regarding finalizing exhibit list, telephone conference with Matt Fitzsimmons regarding same and outcome of Teams Meeting with US Trustee and participate in Teams meeting with US Trustee	3.50	1977.50
07/27/21	Goldman	Cull through Arik Preis declaration with exhibits in preparation for Teams meeting with Matt Gold (.5); receipt/review Debtors' list of witness and email requests to Andrew Alfano for expert reports (.5); Teams meeting with Matt Gold regarding issues/strategy for preparation (.7); begin review of designated exhibits by objecting states and review of witness and exhibit lists transmitted by Debtors and Sacklers (3.0); review and exchange of emails regarding Debtor proposal for handling confirmation hearing (.5)	5.20	2938.00
07/27/21	Riel	Conference with Mr. Goldman; conference with Mr. Goldman, Mr. Gold and Mr. Tuchman regarding case status and documentation filed by debtors	0.70	210.00
07/28/21	Perkins	Review of email received from Mr. Goldman re instructions for review of complaints to be summarized	0.20	34.00
07/28/21	Goldman	Teams meetings with objecting States and conference call with Pillsbury attorneys, compile objecting States' exhibits, assign project regarding summarizing complaints to Nicole Riel, review of and address with Matt Gold email from Davis Polk regarding proposed protocol; locate/review case law regarding admissibility of corporate guilty plea	3.00	1695.00
07/28/21	Kaplan	Telephone conference with Mr. Goldman re confirmation hearing, preparations including summarizing dissenting states' complaints and locating exhibits for hearing	0.80	328.00
07/29/21	Goldman	Review of proposed stipulation from Davis Polk regarding protocol for hearing; discussions with Matt Gold regarding same; begin detailed review of exhibits to Arik Preis declaration; conference call with Davis Polk attorneys regarding proposed stipulation; receipt/review request from Debtors of three-day extension of confirmation schedule; telephone conference with Matt Gold and emails with group regarding proposed response	5.00	2825.00
07/30/21	Goldman	Construct email in response to servers' extension request and telephone conference with Matt Gold re finalizing to send in response	0.50	282.50
07/30/21	Goldman	Conference call with Debtors and Sacklers group re proposed protocol stipulation, and follow up	4.00	2260.00

State of Connecticut Opioid Litigation

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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
		telephone conference with Matt Gold (1.5); receipt/review of debtors' email request to Judge Drain for an extension, and draft response, finalize and transmit to Judge Drain (1.0); continue review of Preis exhibits (.5); teams strategy meeting with Matt Gold, Matt Fitzsimmons, Sara Natium and Tad O'Neill (1.0)		
07/30/21	Perkins	Email communications with Ms. Riel to receive instructions; online research re obtaining complaints for CA, MD and NH from Proof of Claim; obtain CA and NH complaints and send same to Ms. Riel; additional online research re obtaining MD complaint from Office of Attorney General and Consumer Protection Division; telephone call to Office of Administrative Hearings re same	2.10	357.00

Fees **\$53,022.00**

Professional Summary

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Irve J. Goldman	Partner	92.20	565.00	52,093.00
Jonathan A. Kaplan	Partner	0.80	410.00	328.00
Nicole M. Riel	Associate	0.70	300.00	210.00
Kristen F. Perkins	Paralegal	2.30	170.00	391.00

Fees **\$53,022.00**

Total Fees **\$53,022.00**
Total Disbursements **\$0.00**
Less Retainer Applied **(\$53,022.00)**

Total Due This Invoice **\$0.00**

Office of the Attorney General
 Attn: Matthew Fitzsimmons, Esq.
 165 Capitol Avenue
 Hartford, CT 06106

September 16, 2021
Invoice # 382794
Matter # 081979.0001

Re: State of Connecticut Opioid Litigation

For services rendered through August 31, 2021

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
08/01/21	Riel	Begin analyzing the complaints filed by each state and draft a summary of claim filed by each state against third-party defendants	2.70	810.00
08/02/21	Perkins	Telephone conference with Ms. Riel re obtaining MA complaint (0.1); telephone conference with clerk of MD consumer protection division re obtaining copy of complaint (0.1); online research and obtain copy of MA complaint and send same to Ms. Riel (0.3); draft chart summary of claims within state complaints per Mr. Goldman's request (0.6)	1.10	187.00
08/02/21	Goldman	Review and digest of exhibits attached to NCSG; support of UCC privilege motion (3.0); review summary of State court complaints and follow-up with Ms. Riel and Ms. Perkins re same and get Maryland complaint from Brian Edmonds (.5); review of petition for certiorari to U.S. Supreme Court in Hargreaves case for equitable mootness (1.0)	4.50	2542.50
08/02/21	Riel	Continue drafting summary of claims filed by each state against third-party defendants	3.10	930.00
08/02/21	Riel	Conference with Ms. Perkins regarding obtaining the Maryland and Massachusetts complaints	0.10	30.00
08/03/21	Perkins	Revise chart re summary of claims within state complaints; emails with Mr. Goldman re same	0.30	51.00
08/03/21	Goldman	Review and consider Sackler objections to State's trial exhibits, review of exhibits identified in objection as not complete documents (1.5); teams meeting with Matt Gold re objections to exhibits and meet and confer with Sacklers (.5); teams meeting with objecting States re confirmation strategy (1.3); teams meeting with Matt Fitzsimmons, Sara Nadin	3.80	2147.00

Connecticut law requires us to advise you that this communication is an attempt to collect a debt.

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
		re filing amicus brief on equitable mootness petition for certiorari in Hargreaves case (.5)		
08/04/21	Goldman	Review of rest of exhibits subject to Sackler and other parties' objections in preparation for option of meet and confers (1.0); conduct meet and confers with Sacklers (.5); locate/review case authorities re emails as business records and government report as public record under FRE 803(8) and forward to Matt Gold (1.0); receipt/review of debtor email request for status conference, confer with Matt Gold re same; draft response and review Matt Gold response; conduct status conference with Judge Drain and conduct teams meeting with objecting States' group (3.0)	5.50	3107.50
08/05/21	Goldman	Review evidentiary decisions on public records exception and admissibility of emails as business records in preparation for call with Sacklers on exhibits (1.0); exchange of emails on opt-out alternative and other confirmation issues with group and Matt Gold (1.0)	2.00	1130.00
08/05/21	Goldman	Emails re opt-out provision and setting up call with Andrew Troop re opt-out suggestion of Judge Drain (.5); teams meeting with United States Trustee representatives re update on status of confirmation issues (.5); meet and confer with Sacklers on exhibits (.3); teams meeting with Andrew Troop re opt-out comment of Judge Drain (.5); discussions with Matt Gold throughout day re confirmation/settlement approach issues (1.0); teams meeting with operating states re opt-out/settlement approach and evidentiary issue on complaints (1.5); review of virtual procedures; order and provide comments to Matt Gold (.2)	4.50	2542.50
08/06/21	Goldman	Work throughout day in reviewing various submissions filed by confirmation parties on August 5 and communicate with Matt Gold and other objecting states' representatives re same	4.00	2260.00
08/07/21	Goldman	Teams meeting with AG Tong and Assistant Attorneys General re confirmation issues and [REDACTED] (1.0); teams meeting with objecting states group re issues/strategy for confirmation hearing (1.0); complete review of Dubel, Delconte and Conroy declarations, work up list of points for cross and circulate to group (1.5); supplement Connecticut list of witnesses and draft/transmit email to debtor's counsel, et al re same (.5)	4.00	2260.00
08/08/21	Goldman	Complete review of debtors' confirmation brief (1.5); review of and provide input on objecting states' group estimate of cross examination time (.5); review of and provide revisions to Maryland objection to debtors' motion to shorten time re motion to make pre-confirmation payments to set up trusts (1.0); teams meeting with objecting states	4.30	2429.50

State of Connecticut Opioid Litigation

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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
		group re confirmation issues, cross-examinations, preparation for pretrial conference (1.0); review of and provide input for response to Debevoise email re Sackler witnesses (.3)		
08/09/21	Goldman	Prepare for and attend pretrial conference before Judge Drain	3.00	1695.00
08/09/21	Goldman	Email communications throughout day regarding outcome of pretrial and limiting witness cross per Judge's directive; revise witness testimony estimate	2.50	1412.50
08/10/21	Goldman	Work throughout day on confirmation hearing preparation including calls, Team meetings and preparation of witness outlines	6.00	3390.00
08/10/21	Kaplan	Telephone conference with Mr. Goldman, collect cases and analyze whether distinction exists for approved third-party releases/injunction including whether recipient of release was tortfeasor/bad actor	3.50	1435.00
08/11/21	Kaplan	Analyze whether distinction exists for approved third-party releases/injunction including whether recipient of release was tortfeasor/bad actor; email and telephone conference with Mr. Goldman regarding same	2.00	820.00
08/11/21	Goldman	Teams meetings, communications with objecting states group and other preparation for confirmation hearing throughout day, including completion of witness outline for Dubel and transmittal of exhibits for examination	7.50	4237.50
08/12/21	Goldman	Prepare witness outline for DelConte, attend first day of confirmation hearing and intermittent Teams meetings with objecting States' group	7.50	4237.50
08/13/21	Goldman	Attend confirmation hearing, Teams meeting with objecting states group during lunch break	7.00	3955.00
08/15/21	Goldman	Teams meeting with State opposition group to discuss issues/strategy regarding witnesses/oral argument, telephone conference with [REDACTED] and prepare witness outline for Jayne Conroy	3.50	1977.50
08/16/21	Goldman	Attend Purdue Pharma confirmation hearing and participate in Teams meeting after hearing re: strategy	7.00	3955.00
08/17/21	Goldman	Prepare summary of objecting states objections to confirmation for discussion on how to divide up oral/closing argument	1.50	847.50
08/17/21	Goldman	Attend confirmation hearing (6.0); Teams meeting with AGs re: merits of appeal and getting stay pending appeal (1.0); Teams meeting with objecting states group (.5)	7.50	4237.50
08/18/21	Goldman	Attend confirmation hearing and Teams meeting with objecting states during break	4.00	2260.00

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
08/18/21	Goldman	Begin review of jurisdictional decisions in preparation for oral argument and Teams meeting with objecting states group	2.00	1130.00
08/19/21	Goldman	Attend confirmation hearing and Teams meeting at break and after hearing; attend Teams meeting with Bill Harrington and AGs re: appeal	7.00	3955.00
08/19/21	Riel	Conference with Mr. Goldman regarding compiling a chart to assist in oral argument, analyzing the similarities between [REDACTED]	0.20	60.00
08/19/21	Riel	Begin review and analysis of similarities between [REDACTED] for oral argument preparation	1.10	330.00
08/20/21	Riel	Continue review and analysis of similarities [REDACTED] for oral argument preparation; conference with Mr. Goldman regarding same; additionally, review and analyze similarities with [REDACTED]	3.60	1080.00
08/20/21	Goldman	Review of applicable case law and pertinent evidence for preparation of oral argument; Teams meetings with opposition state group	7.00	3955.00
08/20/21	Kaplan	Review In re Sabine Oil & Gas and In re ResCap decisions on subject matter jurisdiction to issue releases; follow up analysis of subject matter jurisdiction, ability to distinguish cases concerning subordination of indemnification claims; email and telephone conference with Mr. Goldman regarding same; telephone conference with Mr. Goldman regarding additional issues concerning insurance policies for D&O Insurance, potential exclusions	2.80	1148.00
08/21/21	Goldman	Work on outline for oral argument	5.00	2825.00
08/22/21	Goldman	Continue to review pertinent cases, evidence and work on argument outline; Teams meetings with united States Trustee group and opposition state group re: appellate issues	6.00	3390.00
08/22/21	Kaplan	Review insurance policies for D&O Insurance, Excess/Indemnity policies and standalone Classic Side A Management as well as all endorsements and email with Mr. Goldman regarding potential exclusions	3.00	1230.00
08/23/21	Goldman	Finish/refine oral argument outline for oral argument on third-party releases, attend oral argument on phase one of confirmation hearings and communicate at break and post-argument with opposition group of States regarding issues/strategy	6.50	3672.50
08/24/21	Goldman	Communications/Teams meetings throughout day with objecting States group re: possible settlement proposal; review of cases cited in support of best	6.50	3672.50

State of Connecticut Opioid Litigation

Invoice No.: 382794
September 16, 2021
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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
		interests argument and Debtor's brief on best interests issues and refine argument outline on best interests argument		
08/25/21	Goldman	Attend confirmation hearing and Teams meeting with opposition States to discuss appeal/settlement prospects	7.00	3955.00
08/26/21	Goldman	Teams meeting with Matt Fitzsimmons and Sara Nadin re: update on CT position on settlement and appeal and telephone conferences with Matt Gold re: same and re: presentation at AG meeting (2.0); Zoom meeting with AGs re: settlement issues and appeal (1.0)	3.00	1695.00
08/26/21	Goldman	Research/locate bankruptcy case authority regarding permissibility of settling appeal of confirmation order with consideration outside of plan	1.00	565.00
08/27/21	Goldman	Attend argument of remaining issues on confirmation (2.0); Conference call with Andrew Troop re: extension of preliminary injunction (.3); check law on whether preliminary injunction under Section 105 [REDACTED] and draft and transmit email re: same to Matt Gold (.7); receipt/review email from Jill Abrams re: [REDACTED] check disclosure statement re: division of NOAT funds to local governments and draft and transmit responsive email to group (1.0)	4.00	2260.00
08/30/21	Goldman	Email correspondence re: voluntary compliance with extension of preliminary injunction (.3); review of Debtor's second revised proposed findings of fact and conclusions of law re: order confirming plan and note areas of concern (1.5)	1.80	1017.00.
08/30/21	Goldman	Teams meeting with Matt Gold re: issues/strategy for call with Davis Polk on stay pending appeal	0.50	282.50
08/31/21	Goldman	Teams meeting with Matt Gold to discuss call with Davis Polk re: stay pending appeal and conference call with Davis Polk attorneys re: same (1.0); review of and respond to question about amending plan after confirmation (.3); review bankruptcy rules and Collier treatise re: seeking direct appeal to Second Circuit (.7)	2.00	1130.00
08/31/21	Goldman	Review bankruptcy appellate rules re: joint appeal and filing appeal before entry of order, email communications with Opposing State Group re: same and prepare notice of appeal for CT	1.00	565.00

Fees

\$92,804.50

Professional Summary

State of Connecticut Opioid Litigation

Invoice No.: 382794

September 16, 2021

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<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Irve J. Goldman	Partner	149.90	565.00	84,693.50
Jonathan A. Kaplan	Partner	11.30	410.00	4,633.00
Nicole M. Riel	Associate	10.80	300.00	3,240.00
Kristen F. Perkins	Paralegal	1.40	170.00	238.00
	Fees			\$92,804.50

Disbursements

	Amount
Express Mail	21.75

Total Disbursements	\$21.75
Total Fees	\$92,804.50
Total Disbursements	\$21.75
Less Retainer Applied	(\$92,826.25)

Total Due This Invoice	\$0.00
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Office of the Attorney General
Attn: Matthew Fitzsimmons, Esq.
165 Capitol Avenue
Hartford, CT 06106

November 16, 2021
Invoice # 385427
Matter # 081979.0001

Re: State of Connecticut Opioid Litigation

For services rendered through October 31, 2021

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
10/12/21	Goldman	Review of US Trustee motion for stay pending appeal filed in SDNY appeal, prepare for CT/Washington joinder in motion, attend hearing before Judge McMahon and attendant travel to and from CT	3.00	1695.00
10/13/21	Goldman	Exchange of email correspondence with US Trustee, Matt Gold and others re working out briefing/declaration schedule with opposition parties, conference call with US Trustee team re approach for stay briefing, draft and transmit email to counsel for committee re briefing/declaration schedule	1.00	565.00
10/13/21	Riel	Conduct research regarding the procedure to petition for permission to take a direct appeal following certification	1.40	420.00
10/25/21	Goldman	Review of US Trustee marked stipulation to resolve stay motions	0.30	169.50
10/25/21	Goldman	Begin review of debtor opposition to stay motions	1.00	565.00
10/26/21	Goldman	Complete review of Debtor and AHC opposition briefs to stay motion and accompanying declarations of Jesse DelConte and John Guard and make notes for reply brief (3.0); review of US Trustee proposed stipulation for resolving stay motions and Teams meeting with Matt Fitzsimmons and WA team re US Trustee stipulation and issues/strategy for reply brief (1.0)	4.00	2260.00
10/27/21	Goldman	Review of opposition to stay motions and two supporting declarations; review of Colin Jorgenson declaration in support of Opposition of Association of Arkansas Counties to stay motions; locate/review case authorities re evidentiary issues raised by	4.00	2260.00

Connecticut law requires us to advise you that this communication is an attempt to collect a debt.

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
		declarations proffered by parties opposing stay motions		
10/28/21	Goldman	Review of evidentiary decisions located for evidentiary objections to be included in reply to oppositions to stay motions and begin preparation of excerpt for reply	5.00	2825.00
10/29/21	Goldman	Continue research and review of case authorities regarding evidentiary objections for reply to oppositions to stay motions and work on evidentiary objection excerpt for reply	6.00	3390.00
10/31/21	Goldman	Review of WA draft of reply to oppositions to stay motions and provide comments; and exchange of email correspondence with group regarding issue of settlement discussions relating to stay proposals and seeking an extension of time to file reply to stay oppositions	1.50	847.50

Fees**\$14,997.00****Professional Summary**

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Irve J. Goldman	Partner	25.80	565.00	14,577.00
Nicole M. Riel	Associate	1.40	300.00	420.00

Fees**\$14,997.00****Disbursements**

	Amount
Filing Fees	298.00

Total Disbursements**\$298.00****Total Fees****\$14,997.00****Total Disbursements****\$298.00****Total Due This Invoice****\$15,295.00**

PULLMAN & COMLEY

ATTORNEYS AT LAW

Office of the Attorney General
Attn: Matthew Fitzsimmons, Esq.
165 Capitol Avenue
Hartford, CT 06106

December 8, 2021
Invoice # 386014
Matter # 081979.0001

Re: State of Connecticut Opioid Litigation

For services rendered through November 30, 2021

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
11/01/21	Goldman	Review of revised WA draft of reply to oppositions to stay motions, make suggested revisions and comments, locate and insert additional Second Circuit case citation for purpose of FRE 701(c) and circulate to working group (1.5); conference call with Bill Harrington and Matt Gold re issues/strategy for stay oppositions and debtor proposal (.5); proof read final version of reply to stay oppositions and get back to Robert Tuchman re same (.5)	2.50	1412.50
11/03/21	Goldman	Review of order establishing procedures for hearing on stay motions and draft and transmit email to group re same (.5); conference call with Paul Schwartzberg and Ben Higgins of US Trustee and Allen Underwood re UST proposed revised stay stipulation; review stipulation and draft and transmit email to CT and WA working group re same (.8)	1.30	734.50
11/04/21	Goldman	Review of US Trustee and Maryland replies to oppositions to stay motion	2.50	1412.50
11/04/21	Goldman	Review of UCC declarations in preparation for meet and confer with UCC attorneys and participate in meet and confer	0.70	395.50
11/05/21	Goldman	Review of US Trustee proposed revised stipulation for stay pending appeal, make changes, circulate to group for comment and draft and transmit email to Debtors, US Trustee, et al. with CT/WA comments to stipulation	0.70	395.50
11/05/21	Goldman	Begin review and digest of stay opposition papers in preparation for 11/9 hearing (1.5); receipt and review of Debtors' letter to Judge Drain requesting status conference and work on response (1.0); review of Collier's and cited case law re Debtors' argument that Bankruptcy Court has no authority to	3.00	1695.00

Connecticut law requires us to advise you that this communication is an attempt to collect a debt.

State of Connecticut Opioid Litigation

Invoice No.: 386014
December 8, 2021
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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
		issue stay pending appeal after District Court issues its decision on appeal (0.5)		
11/07/21	Goldman	Re-review of stay opposition papers and declarations and pertinent case authorities re: stay pending appeal and evidentiary objections in preparation for hearing on stay motions (4.5 hrs)	4.50	2542.50
11/08/21	Goldman	Review USDOJ plea agreement and other pertinent papers relating to stay motions (3.0); work on outline for oral argument (3.5)	6.50	3672.50
11/09/21	Goldman	Complete outline of oral argument for hearing on stay motions (1.0); attend hearing on stay motion and Teams meeting with WA/CT representatives during break (8.50)	9.50	5367.50
11/10/21	Goldman	Teams meeting with WA representatives and Matt Fitzsimmons regarding outcome of November 9 hearing and strategy moving forward (0.5); locate//review federal appellate rules regarding stay pending appeal and draft and transmit e-mail to Matt Fitzsimmons regarding recommendation on stay pending appeal after District Court ruling (1.0)	1.50	847.50
11/12/21	Goldman	Review of Debtors' proposed order denying stay, make comments and circulate to Matt Gold	0.50	282.50
11/15/21	Goldman	Review of US Trustee comments to proposed order denying stay and make comments	0.30	169.50
11/15/21	Goldman	Telephone conference with US Trustee, Matt Gold, Brian Edmunds re proposed order denying stay pending appeal	0.30	169.50
11/28/21	Hrelic	Completed legal research and analysis re indemnification, public policy, and choice of law issues; completed draft of relevant portions of brief; internal correspondence with team; circulated draft (4.1); strategy conference call with team; legal analyses of issues presented; created plan for moving forward with supplemental brief; made revisions and finalized entire supplemental brief pursuant to instructions from team; circulated final draft supplemental brief (2.8); review of e-mail correspondence with team re final revisions to supplemental brief; internal correspondence re final changes necessary; reviewed final version of supplemental brief (.6)	7.50	2250.00
Fees				\$21,347.00

Professional Summary

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Irve J. Goldman	Partner	33.80	565.00	19,097.00
Dana M. Hrelic	Counsel	7.50	300.00	2,250.00

State of Connecticut Opioid Litigation

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Fees	\$21,347.00
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Total Fees	\$21,347.00
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Total Disbursements	\$0.00
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Total Due This Invoice	\$21,347.00
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PULLMAN & COMLEY

ATTORNEYS AT LAW

Office of the Attorney General
Attn: Matthew Fitzsimmons, Esq.
165 Capitol Avenue
Hartford, CT 06106

January 11, 2022
Invoice # 387307
Matter # 081979.0001

Re: State of Connecticut Opioid Litigation

For services rendered through December 31, 2021

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
11/27/21	Katz	Conference with legal team regarding issues for supplemental brief; review relevant pleadings; begin research regarding whether court is required to consider all issues on appeal	5.00	1500.00
11/27/21	Mamillapalli	Meet with Attorney Goldman and Attorneys from AG's office regarding division of research regarding Judge McMahon's order issued on 11/26 (.6); Research insurance question posed by Judge McMahon regarding availability of insurance coverage for CUTPA claims (CA statute, CT statute, and CT case law), and draft findings in research memorandum for AG's office (3.4)	4.00	1200.00
11/27/21	Hrelac	Strategy meeting with State of Connecticut AG team and Pullman & Comley attorneys re necessary expedited supplemental briefing for SDNY (1.0); legal research and analysis re indemnification under CUTPA, public policy and choice of law analysis; drafted relevant portions for supplemental brief (6.3)	7.30	2190.00
11/28/21	Mamillapalli	Meet with team to discuss brief in response to Judge McMahon's order	0.50	150.00
11/28/21	Katz	Continue research regarding requirement of court to consider all issues on appeal; draft memorandum regarding same; conference with legal team regarding same	6.20	1860.00
11/29/21	Mamillapalli	Review debtors' brief and appendix for creating a chart regarding policies and bylaws	0.20	60.00
12/08/21	Goldman	Receive/review emails from Clare Kindall re stay of district court affirmance pending appeal (.3); consult rules/case authorities re stay pending appeal of district court affirmance and draft and transmit	1.30	734.50

Connecticut law requires us to advise you that this communication is an attempt to collect a debt.

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
		emails to Clare Kindall re same (1.0)		
12/09/21	Goldman	Locate/review In re Anderson decision re issue of proper court in which to file motion for stay pending appeal of district court affirmance of bankruptcy court order (.7); draft and transmit email to Clare Kindall forwarding decision and setting forth explanation (.3)	1.00	565.00
12/09/21	Goldman	Conference call with US Trustee, Clare Kindall and Brian Edmunds re stay pending appeal (.7); telephone conference with Clare Kindall re points for motion for stay pending appeal to district court	0.70	395.50
12/11/21	Goldman	Review of draft of motion for stay pending appeal drafted by Clare Kindall (.8); additional research re points of law, make revisions to motion up to page 19 and circulate to Clare Kindall and Matt Fitzsimmons	4.00	2260.00
12/12/21	Goldman	Complete revisions to motion for stay pending appeal	1.50	847.50
12/13/21	Goldman	Review of final motion for stay pending appeal prepared by Clare Kindall (.3); review and respond to Clare Kindall email re factor requiring "strong showing" of success in merits for stay pending appeal and forward recent SDNY decision applying intermediate standard (.4)	0.70	395.50
12/13/21	Goldman	Respond to inquiries by Clare Kindall re VT appeal number and effect of motion for rehearing of Judge McMahon ruling after consulting BR 8022 and Collier's treatise re same	0.50	282.50
12/14/21	Goldman	Locate/review docket and select entries in USA v. Purdue Pharma in USDNJ and provide info to Matt Fitzsimmons (.5); locate and provide to Clare Kindall list of parties to appeal and their attorneys (.3)	0.80	452.00
12/15/21	Goldman	Review of applicable Federal Appellate Rules and Local Second Circuit Rules re notice of appeal to Second Circuit (.7); Teams meeting with CT appellate team re notice of appeal with other logistical/procedural appellate issues (.8); locate and provide same notice of appeal in In re Windstream Holdings (.3)	1.80	1017.00
12/15/21	Goldman	Peruse motion for stay pending appeal marked up by Washington and notice deletion of 523(a)(2)(A) cases (.3); locate case law re nondischargeability of restitution under State Consumer Protection laws under 523(a)(7) and provide to Clare Kindall	1.00	565.00
12/16/21	Goldman	Review of brief in support of stay motion with WA revisions, make revisions and comments, locate Judge McMahon decision in Sears Holding re equitable mootness and add cite to brief	2.00	1130.00
12/20/21	Goldman	Research/locate authorities re difference between seeking direct appeal under 28 USC Sec. 158(d)(2) and seeking leave to appeal interlocutory order	1.00	565.00

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
		under 28 USC Sec. 1292(b)		
12/21/21	Goldman	Emergency call with Arik Preis and Matt Gold re issues/thoughts for proceeding in case after Judge McMahon decision (.6); conference call with Marshall Heubner and Matt Gold re same (1.2)	1.80	1017.00
12/21/21	Goldman	Receipt/review of email from Marc Tobak at Davis Polk re Purdue moving for certification under 28 USC Sec. 1292 and re moving to extend preliminary injunction (.1); research/locate case law on "likelihood of success on the merits" for 105 injunction in bankruptcy context (.3) and draft and transmit email to Matt Fitzsimmons and Clare Kindall re same (.2)	0.60	339.00
12/21/21	Goldman	Telephone conference with Matt Gold re thoughts and strategy following calls with Arik Preis, Marshall Huebner and UST team	0.50	282.50
12/22/21	Goldman	Review of Purdue preliminary injunction papers (.8); telephone conference with Melanie Cyganowski, counsel for AHC, re: effect of Judge McMahon decision, appeal issue, extension of preliminary injunction and possible reorganization plan (.7); telephone conference with Clare Kindall and Matt Fitzsimmons re: appellate issues, preliminary injunction and negotiating a deal with Sacklers (1.2)	2.70	1525.50
12/22/21	Goldman	Receipt/review Tobak response re certification papers and draft and transmit email to States' group re same	0.30	169.50
12/22/21	Goldman	Teams meeting with States' group re preliminary injunction, certification of appeal to Second Circuit and issues/strategy relating thereto (1.5); telephone conference with Marshal Huebner re proposal for consent/non-objection to preliminary injunction (.5)	2.00	1130.00
12/22/21	Goldman	Telephone conferences with Marshall Huebner re proposal to settle preliminary injunction matter and draft and transmit email to State group re outcome	1.20	678.00
12/23/21	Goldman	Receipt/review email from Clare Kindall re whether anti-dissipation injunction for Sacklers will be lost if preliminary injunction is denied, locate/review 22nd and 23rd preliminary injunction and UCC stipulation for anti-dissipation injunction and draft and transmit responsive email informing State group of analysis and conclusions (1.5); review of Purdue preliminary injunction memo and research and locate authorities re finer points of immediacy of irreparable harm required, whether possibility or probability of irreparable harm is required and likelihood of success on merits (2.0)	3.50	1977.50
12/24/21	Goldman	Review of select case authorities and work on opposition to 23rd preliminary injunction	4.50	2542.50
12/25/21	Goldman	Work on opposition to 23rd preliminary injunction	6.00	3390.00
12/26/21	Goldman	Review of and incorporate Matt Gold comments to opposition to 23rd preliminary injunction (.5); Teams	2.00	1130.00

State of Connecticut Opioid Litigation

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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
		meeting with Clare Kindall re status of opposition and issues/strategy for settlement and position on certification of appeal (.5); telephone conference with Arik Preis and Matt Gold re: position on plan settlement discussions and preliminary injunction (.7); telephone conference with Matt Gold re strategy (.3)		
12/27/21	Goldman	Revise footnote 7 to opposition to preliminary injunction and circulate opposition to CT and WA (.5); exchange of email correspondence with Clare Kindall re questions/strategy following a 12/26 call with Arik Preis and Teams meeting with Clare Kindall re opposition to preliminary injunction and strategy (1.0)	1.50	847.50
12/27/21	Goldman	Telephone conference with Arik Preis re striking deal on preliminary injunction request (.3); telephone conference with Matt Gold re same (.3); draft and transmit email to WA and CT re same (.2)	0.80	452.00
12/27/21	Goldman	Telephone conference with Ben Kaminetsky, Eli Vonnegut and Matt Gold re resolution of objection to preliminary injunction (.5); telephone conference with Matt Gold re follow through on proposal accepted by Purdue (.2); draft and transmit email to WA and CT re Purdue's acceptance of proposal for resolution of preliminary injunction (.5); draft and transmit email to larger States' group re same (.2); exchange of emails re AG Ferguson decision to file objection (.5)	1.90	1073.50
12/28/21	Goldman	Emails and telephone conferences throughout morning with Clare Kindall re Washington position on settlement proposed and alternatives to pursue (1.0); telephone conference with Matt Gold re Connecticut position (.2); telephone conference with Brian Edmunds re Maryland position and telephone conference with Ben Kaminetsky and Marc Tobak re Connecticut Proposal (.7); further telephone conference with Ben Kaminetsky re Purdue counterproposal and telephone conference with Clare Kindall re same (.5); Teams meeting with Washington re status (.5); get back to Ben Kaminetsky re Connecticut position and direct/supervise filing of opposition (.4); telephone conference with Arik Preis re settlement breakdown, process moving forward and telephone conference with Matt Gold re same (.7); prepare outline for argument on preliminary injunction (1.3)	5.30	2994.50
12/29/21	Goldman	Continued work on argument outline and preparation for preliminary injunction hearing (1.0); attend preliminary injunction hearing (2.5); Teams meeting with Washington and Connecticut re outcome of hearing and strategy (.5)	4.00	2260.00
12/30/21	Goldman	Receipt and review of proposed 23rd Preliminary Injunction submitted to Chambers to ensure States group was not enjoined but would be voluntarily bound and draft and transmit email to group re:	2.30	1299.50

State of Connecticut Opioid Litigation

Invoice No.: 387307

January 11, 2022

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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
		same (.7); Receipt and review of email from Ben Kaminetsky re: telephonic chambers conference on 12/31 and draft and transmit email to group re same (.3); Telephone conference with Larry Fogelman of US government regarding status of case after preliminary injunction hearing and issues going forward in case (.5); Teams meeting with Clare Kindall and Matt Fitzsimmons re: outcome of States' meeting and how to approach 12/31 telephonic Chambers conference (.5); Draft and transmit email to States group re need to contact Chambers to advise of additional participants in Chambers conference (.3)		
12/31/21	Goldman	Telephone conference with Matt Gold re status; contact Judge's chambers to advise as to additional participants for Chambers conference; preparation for and attend telephonic chambers conference before Judge Drain; post-conference discussions with States group	2.50	1412.50

Fees **\$40,690.50**

Professional Summary

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Irve J. Goldman	Partner	59.70	565.00	33,730.50
Dana M. Hrelac	Counsel	7.30	300.00	2,190.00
Johanna S. Katz	Associate	11.20	300.00	3,360.00
Snigdha Mamillapalli	Associate	4.70	300.00	1,410.00

Fees **\$40,690.50**

Disbursements

	<u>Amount</u>
On-line Legal Research	336.31

Total Disbursements **\$336.31**

Total Fees **\$40,690.50**

Total Disbursements **\$336.31**

Total Due This Invoice **\$41,026.81**

Office of the Attorney General
Attn: Matthew Fitzsimmons, Esq.
165 Capitol Avenue
Hartford, CT 06106

February 18, 2022
Invoice # 389146
Matter # 081979.0001

Re: State of Connecticut Opioid Litigation

For services rendered through January 31, 2022

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
01/01/22	Goldman	Conference call with Arik Preis and Matt Gold re: 12/31 telephonic Chambers conference and settlement and plan issues (.8); telephone conference with Matt Gold re: observations from call with Arik Preis (.2)	1.00	565.00
01/02/22	Goldman	Receipt and review of draft email to States group from Matt Gold re: report on conference call with Arik Preis (.2); Review notes of call and make revisions and additions to email report to States group (.8)	1.00	565.00
01/03/22	Goldman	Review of order appointing Judge Chapman as mediator and order establishing terms and conditions for mediation	1.00	565.00
01/03/22	Goldman	Review of certification motion and memorandum of law in support and receipt and review of Judge McMahon's order setting deadline for response and circulate (1.0); telephone conference with Matt Fitzsimmons re update on negotiation process and position on certification motion (.5)	1.50	847.50
01/03/22	Goldman	Research, locate and review decisions re certification standards under 28 USC Section 1292(b) and in particular whether certification will materially advance bankruptcy case	1.30	734.50
01/04/22	Goldman	Telephone conference with Matt Gold re thoughts on Certification Motion (.2); Teams meeting with Clare Kindall and Matt Fitzsimmons re position on status certification motion and of settlement process (.6)	0.80	452.00
01/04/22	Goldman	Conduct supplemental research and review of applicable case authorities on standards for certification under 28 USC § 1292(b) (1.5); and	3.50	1977.50

Connecticut law requires us to advise you that this communication is an attempt to collect a debt.

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
		begin preparation of memorandum in opposition to certification of appeal (2.0).		
01/05/22	Goldman	Work throughout day on memorandum in opposition to Purdue and Sackler certification motions while culling through select case authorities for inclusion in memorandum regarding standards/criteria for certifying interlocutory appeal under 28 USC § 1292(b) (7.5); Receipt and review of comments/suggested revisions to memorandum from Clare Kindall and prepare responses and suggested edits to her comments/suggested revisions (.5); Receive response from Clare Kindall re: finalizing draft and circulating to nine appealing States, finalize draft and circulate as instructed (.5)	8.50	4802.50
01/06/22	Goldman	Draft inserts to brief in opposition to certification to motions to address Sackler motion and Raymond Sackler memorandum of law in support of certification (1.0); review of CA brief in opposition to certification to determine whether to adopt (.5); work throughout day in fielding and incorporation comments to opposition brief from DE, RI, VT and MD and otherwise finalizing opposition brief for filing (4.0)	5.50	3107.50
01/07/22	Goldman	Review of email correspondence from Clare Kindall re settlement negotiations and Sackler proposal conveyed by Judge Chapman and draft and transmit email to Clare Kindall re points/issues in response to proposal (.5); telephone conference with Matt Fitzsimmons re Sackler proposal and issues and strategy re structuring settlement and plan (.5); telephone conference with Bill Harrington re appeal and case issues and Judge McMahon certification (.5); locate/review decisions on opt-out alternative plan structure (1.0); prepare for and participate in Teams meeting with the appealing States' AGs (1.0)	3.50	1977.50
01/08/22	Goldman	Teams meeting with Clare Kindall and Matt Fitzsimmons re status of AG discussions and settlement and appellate issues (.5); draft memo of plan structure alternatives for State AGs (2.0); review of Matt Gold suggested changes and comments and make changes and comments to his changes and comments and incorporate all into final draft (1.0)	3.50	1977.50
01/10/22	Goldman	Telephone conference with Matt Fitzsimmons re status of mediation and issues/strategy for moving forward in case and on appeal	0.40	226.00
01/12/22	Goldman	Telephone conference with Matt Fitzsimmons re status of settlement negotiations and issues for second circuit appeal	0.30	169.50
01/12/22	Goldman	Receipt/review of Kaminetsky email re expedited briefing schedule, check Local Second Circuit rules re motions and draft and transmit response to group	0.50	282.50

State of Connecticut Opioid Litigation

Invoice No.: 389146
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Page 3

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
01/13/22	Goldman	Exchange of email correspondence with Brian Edmunds et al re responding to Purdue request for position on expedited briefing schedule and draft response	0.30	169.50
01/13/22	Goldman	Locate/review Second Circuit decisions, FRAP and other authority re procedure and substance of Circuit Court accepting appeal that has been certified under 28 USC Sec. 1292(b)	1.50	847.50
01/13/22	Goldman	Teams meeting with Clare Kindall and Matt Fitzsimmons re status of mediation efforts and position to take on Purdue expedited appeal request	0.50	282.50
01/14/22	Goldman	Exchange of email correspondence with Clare Kindall, Marion Quirk and Ben Kaminetzky re position on expedited briefing schedule and transmit CT position to Kaminetzky	0.40	226.00
01/14/22	Goldman	Collect/review additional Second Circuit decisions re interlocutory appeal under 28 USC Section 1292(b)	1.00	565.00
01/17/22	Goldman	Telephone conference with Marshall Huebner re extension of preliminary injunction to 2/17/22 and request for States' consent (.4); draft and transmit emails to Matt Fitzsimmons and WA and MD representatives re Huebner request (.3)	0.70	395.50
01/18/22	Goldman	Telephone conference with Matt Fitzsimmons re presentation set up by Judge Chapman, preliminary injunction and other appellate issues (.8); locate/provide excerpt on opt-out/option issue for bankruptcy presentation at 4 pm (.2)	1.00	565.00
01/18/22	Goldman	Update research and locate and review decisions in SDNY re permissibility of opt-out provision for third-party releases in Chapter 11 plan and provide to Matt Fitzsimmons with explanatory emails	1.50	847.50
01/18/22	Goldman	Check rules/decisions re procedure for dismissal of notice of appeal of interlocutory order and check docket of Second Circuit for status of Purdue notice of appeal and petition for Circuit to take appeal (1.0); review of petitions for interlocutory appeal filed by Purdue and Sacklers (1.0)	2.00	1130.00
01/19/22	Hrelac	E-mail correspondence and telephone conference with Attorney Goldman re issue with notices of appearance in Second Circuit (.3); drafted special notices of appearance for Attorneys Kindall, Fitzsimmons, and Goldman; created certification page; reviewed Second Circuit local rules re filing notices of appearance; reviewed docket of consolidated appeals; filed notices of appearance (1.4); e-mail correspondence with Attorney Goldman and Ms. McCoy re: next steps for filing Attorney Goldman's appearance and service of notices to pro se parties (.3)	2.00	600.00
01/19/22	Goldman	Teams meeting with Clare Kindall and Matt	0.70	395.50

State of Connecticut Opioid Litigation

Invoice No.: 389146
February 18, 2022
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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
		Fitzsimmons re responding to petition for interlocutory appeal and preliminary injunction request		
01/20/22	Goldman	Research/locate case authorities on circuit court of appeals issue	1.00	565.00
01/20/22	Goldman	Prepare Joinder to CA opposition to petitions for interlocutory appeal and receive and incorporate comments of Clare Kindall	1.50	847.50
01/20/22	Hrelc	E-mail correspondence with Ms. McCoy and Ms. Carpenter re service of notices of appearance to pro se parties in consolidated appeals (.2)	0.20	60.00
01/21/22	Goldman	Review Judge Chapman email re proposal for final mediation session (.4); review mediation order and draft and transmit email to Clare Kindall and Matt Fitzsimmons re issues with Judge Chapman's request (.6)	1.00	565.00
01/21/22	Goldman	Receipt/review of email from Clare Kindall re checking to see if appeal has been accepted; check docket and get back to Clare Kindall re same (.3); locate appellate authority that count of appeals can affirm on any ground raised below even if district court failed to consider it (.7)	1.00	565.00
01/21/22	Goldman	Check with Second Circuit Clerk re status of appeals and get back to Clare Kindall re same	0.20	113.00
01/21/22	Goldman	Review of Purdue Memorandum in support of extension of preliminary injunction and draft and transmit email to Matt Fitzsimmons re recommendation as to whether to oppose	0.70	395.50
01/25/22	Hrelc	Reviewed docket and e-mail correspondence with Attorneys Kindall, Goldman and Fitsimmons re notices of appearance in Second Circuit (1.0)	1.00	300.00
01/25/22	Goldman	Receipt, review and respond to email of Clare Kindall re appellate briefing division of labor and SPV issue (.2); receipt/review of email from Clare Kindall re vacation of Judge McMahon decision as part of settlement, locate/review applicable case authorities re standards for vacating decision as part of settlement will provide to Clare Kindall (1.5)	1.70	960.50
01/26/22	Goldman	Conference call with AG Tong, Deputy AG and Matt Fitzsimmons re settlement terms with Sacklers and possible permutations [REDACTED]	0.50	282.50
01/26/22	Goldman	Telephone conference with Matt Fitzsimmons re status of mediation and settlement proposals	0.50	282.50
01/26/22	Hrelc	E-mail correspondence re notice of appearance clarification and correction on docket	0.20	60.00
01/28/22	Goldman	Receipt/review requests from Purdue and UCC for consent to oversized briefs, check Second Circuit local rules and email to Clare Kindall and Matt Fitzsimmons re CT position (.3); receipt/review Second Circuit order certifying appeal and setting	0.60	339.00

State of Connecticut Opioid Litigation

Invoice No.: 389146

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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
		briefing schedule and calendar deadlines (.3)		
01/28/22	Goldman	Draft/transmit email to Purdue and UCC counsel re enlargement of principal briefs (.2); research re whether cross-appeal is necessary for Judge McMahon ruling upholding subject matter jurisdiction (1.0)	1.20	678.00
01/31/22	Goldman	Review Form C and Form D filed by Purdue, AHC and MSGE and review of applicable Second Circuit appellate rules re required appellate filings (1.2); review of PI executive committee objection to extension of preliminary injunction and email to Clare Kindall and Matt Fitzsimmons re same (.3); review of and respond to Marie Ecke re acceptance of papers by email (.2)	1.70	960.50
01/31/22	Goldman	Locate/review Second Circuit authority re issue of whether Second Circuit may address on appeal issues that were briefed and argued below but not decided by court below (.8); telephone conference with Matt Fitzsimmons re status of mediation and hearing on extension of preliminary injunction	1.20	678.00
01/31/22	Goldman	Review of Ferguson email and allocation scenario forwarded by Clare Kindall (.4); telephone conference with Matt Gold re settlement issues/structure re allocation (.6)	1.00	565.00

Fees **\$32,490.50**

Professional Summary

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Irve J. Goldman	Partner	55.70	565.00	31,470.50
Dana M. Hrelac	Counsel	3.40	300.00	1,020.00

Fees **\$32,490.50**

Total Fees **\$32,490.50**
Total Disbursements **\$0.00**

Total Due This Invoice **\$32,490.50**

Office of the Attorney General
Attn: Matthew Fitzsimmons, Esq.
165 Capitol Avenue
Hartford, CT 06106

March 14, 2022
Invoice # 390098
Matter # 081979.0001

Re: State of Connecticut Opioid Litigation

For services rendered through February 28, 2022

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
02/01/22	Goldman	Draft and transmit follow-up email to Clare Kindall and Matt Fitzsimmons re Matt Gold/WA allocation structure (.3); telephone conference with Matt Fitzsimmons re status of mediation and CT requirements for settlement (.4)	0.70	395.50
02/01/22	Goldman	Locate/review of Sackler motion re civil settlement with DOJ [REDACTED] (.6); locate/review of select portions of Paterson v. Mahwah decision from E.D. Va. disapproving third party releases based in part on Judge McMahon's decision (.7); attend hearing on motion to extend preliminary injunction (.5)	1.80	1017.00
02/02/22	Goldman	Review of Purdue and other appellants' statement of the issues and designation of record for appeal (.8); locate and review Sackler stipulation with Objecting States for admission of trial exhibits and cross-check with Purdue designation to ensure all exhibits are included (1.2); draft and transmit email to Clare Kindall re same (.2)	2.20	1243.00
02/02/22	Goldman	Attend to considering issues of incorporating [REDACTED] into settlement with Sacklers and potential court approval of same (1.5); telephone conference with Matt Fitzsimmons re preparation for Teams meeting with AG and Deputy AG (.5); Teams meeting with AG, Deputy AG and Matt Fitzsimmons re how best to [REDACTED] into settlement plan (.5)	2.50	1412.50
02/02/22	Goldman	Locate/review decisions re [REDACTED]	0.50	282.50

Connecticut law requires us to advise you that this communication is an attempt to collect a debt.

State of Connecticut Opioid Litigation

Invoice No.: 390098
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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
02/03/22	Goldman	Teams meeting with Clare Kindall and Matt Fitzsimmons re status of mediation, appellate issues and amicus request	0.70	395.50
02/03/22	Goldman	Telephone conference with Bill Harrington re Debtor statement of the issues, which go beyond Second Circuit order certifying appeal	0.30	169.50
02/09/22	Goldman	Review Purdue most recent motion for extension of preliminary injunction, calendar objection deadline and hearing date and email to Matt Fitzsimmons and Clare Kindall re CT position; register for hearing	0.30	169.50
02/11/22	Goldman	Receipt/review of email from Bob Keach of ABI Commission to Study Chapter 11 re amicus filing, check ABI commission report on topic of third party releases and draft and transmit email to Clare Kindall and Matt Fitzsimmons re same	0.40	226.00
02/14/22	Goldman	Follow up email on amicus requests, receive response from Clare Kindall re same and respond to parties requesting to file amicus brief	0.30	169.50
02/15/22	Goldman	Telephone conference with Matt Fitzsimmons re status of negotiations with WA	0.30	169.50
02/16/22	Goldman	Teams meeting with Clare Kindall re status of mediation efforts, WA position and appellee briefs (.5); review of AG Ferguson response to settlement accepted by Appellee States (.2)	0.70	395.50
02/17/22	Goldman	Telephone conference with Matt Fitzsimmons re outcome of PI hearing; status of mediation and appellate briefing planning	0.30	169.50
02/19/22	Goldman	Review of Purdue Second Circuit Appellate Brief and make notes re counterpoints/further research for opposition brief	4.00	2260.00
02/20/22	Goldman	Review of UCC and AHC Second Circuit Appellate Brief and make notes re counterpoints/further research for opposition brief (3.5); locate/review authorities re Second Circuit standard for reaching issues on appeal that were not addressed by District Court (.5)	4.00	2260.00
02/23/22	Hrelic	Reviewed District Court memorandum of decision in preparation for strategy meeting (1.2)	1.20	360.00
02/24/22	Hrelic	Reviewed District Court memorandum of decision in preparation for strategy meeting; legal research re significant cases relevant to statutory construction argument (.8); telephone strategy conference with Attorney General's Office and Mr. Goldman (1.1); telephone conference re bankruptcy documents and potential settlement details with Mr. Goldman and Attorney General's Office (.4); telephone strategy conference and legal analysis re significant cases relevant to statutory construction argument with Mr. Goldman and Mr. Skold (.9); reviewed notes re Circuit split on statutory construction issue	7.90	2370.00

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Amount</u>
		(.2); legal research and analysis of parties' and amicus briefs, memorandum of decision, and relevant case law re Circuit split on statutory construction issue, began drafting outline of circuit split (.4.5)		
02/24/22	Goldman	Review Clare Kindall outline in preparation for 9 a.m. Teams meeting; participate in briefing coordination meeting with Clare Kindall, et al and conduct follow up meeting with Matt Fitzsimmons re status of mediation and review Owen's responses to Jeff Rupert questions re term sheet (1.5); Teams meeting with Mike Skold and Dana Hrelc re statutory briefing issues (.7); search for and collect [REDACTED] decision, and decisions on [REDACTED] for appellate brief and provide to briefing team with synopsis email (1.3); telephone conference with Bill Harrington re briefing questions for US Trustee (.3)	3.80	2147.00
02/24/22	Goldman	Telephone conference with Matt Fitzsimmons re medical license issue (.3); draft and transmit email to Healthcare practice group re [REDACTED] and exchange of emails re assignment of project (.4)	0.70	395.50
02/25/22	Goldman	Review of CT/WA district court brief on Metromedia related issues and review of portions of Judge McMahon decision relevant to Metromedia argument (2.5); review of Section 10.7(b) release with respect to [REDACTED] issue (.5)	3.00	1695.00
02/25/22	Kurs	Preparation of memorandum regarding Connecticut [REDACTED] process [REDACTED] and release of potential [REDACTED] (2.7); prepare additional explanation of process (1.9)	4.60	2530.00
02/25/22	Hrelc	Legal research and analysis of parties' and amicus briefs, memorandum of decision, and relevant case law re Circuit split on statutory construction issue, began drafting outline of circuit split (8.1)	8.10	2430.00
02/25/22	Cowherd	Review email correspondence from Assistant Attorney General and drafts of [REDACTED] issues memorandum from Mr. Kurs and provide comments on same	0.50	265.00
02/26/22	Hrelc	Reviewed and finalized memorandum re Circuit split on statutory issue (.6); e-mail correspondence with Mr. Skold re memorandum (.1); e-mail correspondence with trial team re memorandum and sent to team (.1)	0.80	240.00
02/26/22	Goldman	Review of Metromedia, Dow Corning, Continental, Karta, Johnson Manville decisions and salient other decisions for preparation of Metromedia portion of appellate brief	2.00	1130.00
02/27/22	Goldman	Work on Metromedia excerpt for Second Circuit appellate brief	2.00	1130.00

State of Connecticut Opioid Litigation

Invoice No.: 390098
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Fees **\$25,427.50**

Professional Summary

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen M. Cowherd	Partner	0.50	530.00	265.00
Irve J. Goldman	Partner	30.50	565.00	17,232.50
Michael A. Kurs	Partner	4.60	550.00	2,530.00
Dana M. Hrelac	Counsel	18.00	300.00	5,400.00

Fees **\$25,427.50**

Total Fees **\$25,427.50**

Total Disbursements **\$0.00**

Total Due This Invoice **\$25,427.50**

Tad Robinson O'Neill
Assistant Attorney General
Consumer Protection Division
800 Fifth Avenue
Suite 2000
Seattle, WA 98104-3188

October 29, 2021
Invoice # 384651
Matter # 082754.0001

**Re: Joint Representation in Appeal of Chapter 11 Confirmation
Order in re: Purdue Pharma L.P., et al.**

For services rendered through October 11, 2021

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/01/21	Goldman	Attend oral bench ruling of Judge Drain on confirmation of plan (6.5); telephone conferences and email communications with Matt Gold and Matt Fitzsimmons re: timing of filing of notice of appeal and revise notice of appeal (1.5)	8.00	565.00	4520.00
09/02/21	Goldman	Conference call with Bill Harrington and Matt Gold re: stay pending appeal (.5); Teams meeting with opposing States' group re: issues/strategy (1.0)	1.50	565.00	847.50
09/08/21	Goldman	Review of and add comments/case authorities and additional arguments to WA draft of motion for stay pending appeal (4.5); Teams meeting with Matt Gold, Tad Robinson and Matt Fitzsimmons re issues/strategy for dealing with debtor motion for authority to make advances to set up plan trusts (.5); Teams meeting with objecting states' group re same (.5)	5.50	565.00	3107.50
09/09/21	Goldman	Review of plan and disclosure statement for first Sackler settlement payment and initial distributions to PI trust for PI claimants and initial NOAT funding; draft and transmit email to Matt Fitzsimmons re: same; telephone conference with Matt Fitzsimmons re appellate issues	0.70	565.00	395.50
09/10/21	Goldman	Review of revised motion for stay pending appeal provided by WA counsel and provide comments	0.70	565.00	395.50

Connecticut law requires us to advise you that this communication is an attempt to collect a debt.

Joint Representation in Appeal of Chapter 11 Confirmation
Order in re: Purdue Pharma L.P., et al.

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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/13/21	Goldman	Review of trust advance motion, objections and debtor reply in preparation for 9/13 hearing (1.0); attend hearing on trust advance motion, motion to authorize bonuses to executives and motion of Ellen Isaacs to reconsider (3.0)	4.00	565.00	2260.00
09/14/21	Goldman	Teams meeting with AGs from Objecting States	1.00	565.00	565.00
09/15/21	Goldman	Review of recent decision in Fusion Connect re reversal of bankruptcy court decision holding FCC fine was not nondischargeable under Section 523(a)(2)(A) and 1141(d)(6) relative to dischargeability of consumer protection claims of States against Sacklers (.7); locate and review of two cases that have petitioned for certiorari for review of equitable mootness doctrine to add to motion for stay pending appeal (.5)	1.20	565.00	678.00
09/17/21	Goldman	Review of and make revisions to State of Washington draft of motion for stay pending appeal and telephone conference with Matt Gold re working through suggested revisions (2.0); revise notice of appeal and prepare related case statement to account for earlier appeals and supervise filing of notice of appeal of confirmation order and ancillary filings (2.0)	4.00	565.00	2260.00
09/18/21	Goldman	Review of Judge Drain's written decision on confirmation issued on 9/17 and make relevant notes (2.0); Teams meeting with Matt Gold and Tad Robinson of Washington, and Matt Fitzsimmons and Sara Nadimre: revising and filing joint motion for stay pending appeal in light of written decision (.7); review of Airadigm, Federal Mogul and Dow Corning decisions cited by Judge Drain in his written decision and make revisions to joint motion for stay pending appeal (4.0)	6.70	565.00	3785.50
09/19/21	Goldman	Review of joint motion for stay pending appeal with Washington and Connecticut; revisions to account for Judge Drain's 9/17 written decision and make additional revisions re: Quigley decision for subject matter jurisdiction section for motion and other revisions throughout motion	1.30	565.00	734.50
09/20/21	Goldman	Review of US Trustee motion for stay	5.50	565.00	3107.50

Joint Representation in Appeal of Chapter 11 Confirmation
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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		pending appeal and pertinent portions of Judge Drain's 9/17 confirmation decision to prepare memorandum re outline of appellate issues per request of Matt Fitzsimmons (1.5); prepare memorandum re outline of issues to be presented on appeal (3.5); Teams meeting with Bill Harrington, US Trustee for Second Circuit, and Matt Gold, re issues/strategy for appeal (.5)			
09/21/21	Goldman	Teams meeting with RI Attorney General and deputies (1.0); conference call with Debtor, various Committee representatives and US Trustee re motion for bridge order for stay pending appeal and motion to shorten notice in connection therewith (.5); Teams meeting with Objecting States' group re appellate issues/strategy (1.0)	2.50	565.00	1412.50
09/23/21	Goldman	Teams meeting with Matt Gold and appellate team re stay and other appellate issues (1.2); review of pertinent decisions re factors for equitable mootness and bond requirement when US is an appellant (.5); Teams meeting with Bill Harrington, US Trustee, Matt Gold and Tad Robinson re stay and appellate issues and telephone conference with Matt Fitzsimmons re same (1.0); locate 12th Amended Plan Supplement and last version of shareholder Settlement Agreement to review for Sackler rescission right (.6)	3.20	565.00	1808.00
09/24/21	Goldman	Prepare amended notice of appeal, civil cover sheet and related case statement and check US District Court for civil case numbers	1.30	565.00	734.50
09/24/21	Goldman	Review of pertinent provisions of Shareholder Settlement Agreement and Plan re Sackler rescission right and prepare memorandum to file re: same (2.0); proof read/finalize amended notice of appeal and ancillary papers for filing and check SDNY District Court for US Trustee motion for stay pending appeal per question of Matt Fitzsimmons (.5)	2.50	565.00	1412.50
09/27/21	Goldman	Prepare statement of the issues to be presented on appeal (2.5); review of designation of items to be included in record on appeal prepared by Matt Gold's office, go through list of trial exhibits to determine if anything should	4.50	565.00	2542.50

Joint Representation in Appeal of Chapter 11 Confirmation
Order in re: Purdue Pharma L.P., et al.

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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		be added, review DelConte fact declaration and D&O policies referenced and prepare list of items to be added for record on appeal (2.0)			
09/28/21	Goldman	Review US Trustee proposed agenda for status conference and relevant portions of plan and restructuring memorandum cited therein (1.5); review of equitable mootness proposal circulated by Tad Robinson and make and circulate proposed revisions (.5); Teams meeting with objecting states group re appellate strategy and issues (1.0); telephone conference with Alex Lees at Millbank and Katherine Benedict at Davis Polk re getting marked state exhibits (.3)	3.30	565.00	1864.50
09/29/21	Goldman	Review and revise draft of status conference email to Chambers and telephone conference with Matt Gold re same and source of two day delay in Effective Date	1.00	565.00	565.00
09/30/21	Goldman	Review US Trustee email and equitable mootness proposal and email to Chambers in preparation for 11 a.m. call with US Trustee, debtor, and creditor groups re 2 p.m. status conference (1.0); participate in 11 a.m. Webex call/meeting (1.5); prepare for and attend 2 p.m. status conference before Judge Drain re stay motions (1.0)	3.50	565.00	1977.50
10/01/21	Goldman	Review of revised version of motion for certification for direct appeal, make comments (.5); research/locate decision on committee as appellee in appeal of confirmation order (.5)	1.00	565.00	565.00
10/01/21	Goldman	Telephone conference with Matt Gold re appellate issues and strategy in light of status conference (.5); Teams meeting with Matt Gold and Barney Eskandari re coordinating appellate strategy with California (.5); review/revise application for direct certification to Second Circuit (.5); draft and transmit email to debtors and creditor groups re declaration evidence (.3)	1.80	565.00	1017.00
10/04/21	Goldman	Teams meeting with Matt Gold and US Trustee team re issues/strategy for hearing on motions for stay pending appeal (.8); review of emails from Debtors, UCC and MSGE group re declaration testimony, exchange of	1.50	565.00	847.50

Joint Representation in Appeal of Chapter 11 Confirmation
Order in re: Purdue Pharma L.P., et al.

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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		emails with Matt Fitzsimmons re same and email to Brian Edmonds re victim declarations (.7)			
10/05/21	Goldman	Receipt/review debtor email re briefing schedule and hearing on stay motion; Teams meetings and discussions throughout morning and into afternoon with Matt Gold, Washington and other objecting states re appellate strategy and stay pending appeal; draft and circulate email to Chambers re hearing date; receipt/review of Hubner response and draft and circulate explanatory email response to Chambers	4.00	565.00	2260.00
10/06/21	Goldman	Telephone conference with Matt Gold re responding to opposing parties in light of scheduling a hearing on 11/9 (.3); receipt/review notice of scheduling conference of Judge McMahon; receipt/review of transcript of 9/30 status conference and draft email to respond to Gerald McCarthy email on 10/4 re appellate issues (1.5); review joint representation documents and Teams meeting re same and re appellate issues (1.2)	3.00	565.00	1695.00
10/07/21	Goldman	Review of revised joint retention documents, discussions with David Atkins re same, receive comments and incorporate into revised engagement letter (1.5); Teams meeting with objecting state group, and discussions and email exchanges throughout day re stay pending appeal and briefing schedule (1.5); review of briefing/stay proposal from Marshall Huebner and telephone conferences with Marshall Huebner re possible settlement of issue (1.0)	4.00	565.00	2260.00
10/08/21	Goldman	Receipt/review of Judge McMahon order re letter writing and agenda for scheduling conference (.2); telephone conference with Matt Gold re briefing issues (.2)	0.70	565.00	395.50
10/08/21	Goldman	Telephone conference with Matt Gold re briefing responsibilities (.5); telephone conference with Marshall Huebner re settlement of stay motions (.5); review/revisions to joint representation documents and Teams meeting re same (1.5); prepare list of appellate issues and conference call with US Trustee team re Tuesday	3.50	565.00	1977.50

Joint Representation in Appeal of Chapter 11 Confirmation
Order in re: Purdue Pharma L.P., et al.

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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		conference (1.0)			
10/11/21	Goldman	Review TRO; locate/review Windstream Decision re equitable mootness; review of emails/materials relative to 11 am discussion with State's Group re appellate issues and participate in 9:30 am Teams meeting with Matt Gold, Sara Nadian and Tad Robinson re appellate issues/strategy and 11 am Teams meeting with appealing States Group re same	3.50	565.00	1977.50
10/11/21	Goldman	Prepare list for filing per Judge McMahon directive, receipt, review of and respond to email from CA Assistant AG re certification, meetings, calls and exchange of email correspondence throughout day re issues relating to scheduling conference on October 12; review of and complete joint submission form prepared by Debtors	3.50	565.00	1977.50

Fees **\$49,946.00**

Professional Summary

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Irve J. Goldman	Partner	88.40	565.00	49,946.00

Fees **\$49,946.00**

Disbursements

	Amount
Transcripts	750.00

Total Disbursements **\$750.00**

Total Fees **\$49,946.00**

Total Disbursements **\$750.00**

Total Due This Invoice **\$50,696.00**

State of Washington
Consumer Protection Division
ATTN: Tad Robinson O'Neill, Asst. Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188

November 12, 2021
Invoice # 385156
Matter # 082754.0001

**Re: Joint Representation in Appeal of Chapter 11 Confirmation
Order in re: Purdue Pharma L.P., et al.**

For services rendered through October 31, 2021

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/12/21	Goldman	Prepare for and attend scheduling/status conference before Judge McMahon and attendant travel to and from CT	4.50	565.00	2542.50
10/13/21	Goldman	Receipt/review of briefs in opposition to motion for certification for direct review, review select cited authorities, telephone conferences with Matt Gold and others re coordination on argument, begin preparation of outline for oral argument on motion; review procedural requirements for getting approval from Second Circuit after certification and provide instructions for research to Nicole Riel	4.00	565.00	2260.00
10/14/21	Goldman	Teams meeting with group re recap of 10/14 hearing and issues/strategy for appeal	1.50	565.00	847.50
10/14/21	Goldman	Complete preparation of oral argument outline for hearing on motion for certification for direct review (1.5); attend hearing (5.0)	6.50	565.00	3672.50
10/15/21	Goldman	Telephone conference with Matt Gold re appellate strategy and conference call with US Trustee team re appendices, appeal exhibits and other appellate issues (.8); review of transcript of 10/13 status conference (.5); locate State Court complaints and Sackler Civil Settlement Agreement with DOJ to send to Judge McMahon	2.50	565.00	1412.50

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Joint Representation in Appeal of Chapter 11 Confirmation
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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		(.7); draft email adding points to briefing structure prepared and circulated by WA (.5)			
10/15/21	Goldman	Teams meeting with Matt Fitzsimmons and Sara Nadim re briefing structure, appellate issues	0.70	565.00	395.50
10/16/21	Goldman	Review Ditech and Quigley decisions and modified bench ruling on best interests objection and begin work on best interests argument for appellate brief	3.00	565.00	1695.00
10/17/21	Goldman	Receipt/review Davis Polk email re redaction of record designations and draft and transmit email in response (.5); work on best interests argument for appellate brief (3.0)	3.50	565.00	1977.50
10/18/21	Goldman	Complete best interests argument for appellate brief and circulate to group; receive comments from Conn. solicitor general, make changes and re-circulate	4.50	565.00	2542.50
10/19/21	Goldman	Receive and review comments from group on best interest of creditors argument for appellate brief, locate case authority re: standard of review for statutory interpretation and best interest of creditors ruling, telephone conferences with Matt Gold re: best interest argument and other appellate issues, and work throughout day in incorporating comments and standards of review into best interest excerpt	6.00	565.00	3390.00
10/20/21	Goldman	Review of WA draft of appellate brief and work throughout day on comments, including insertion of pertinent case authority and record cites; receive and merge comments from CT Solicitor General and Matt Fitzsimmons into draft; conference call with Jill Abrams and Marion Quirk re coordinating comments to draft and exchange of emails re: same	6.50	565.00	3672.50
10/21/21	Goldman	Receipt and review of VT and DE comments to appellate brief and incorporate into master draft for circulation back to WA (2.0); Teams meeting with Clare Kindall and Matt Fitzsimmons re best interest excerpt (.5); receive WA comments to Part A of best interests excerpt, work on incorporation and replying to comments and circulate for internal review (1.5); receipt, review and incorporate WA comments to Part B of best interest	6.00	565.00	3390.00

Joint Representation in Appeal of Chapter 11 Confirmation
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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		excerpt and incorporate into clean and marked versions for circulation (2.0)			
10/22/21	Goldman	Finalize best interest excerpt for appellate brief and circulate to group (1.5); review of consolidated draft after all States' first round of revisions; Teams meeting with Clare Kindall and Matt Fitzsimmons and make proposed revisions to consolidated draft (3.5)	5.00	565.00	2825.00
10/23/21	Goldman	Review of revised consolidated appellate brief, compare to comments of CT circulated on 10/22, make additional comments re: CT comments that were not incorporated into consolidated version of brief and circulate to group	1.50	565.00	847.50
10/24/21	Goldman	Review of explanation provided by WA for not including footnote re: [REDACTED] in brief, review of Supreme Court decision in [REDACTED] cite check and locate decisions that have authorized disgorgement under other statutory schemes, add new comments to brief substituting cite to [REDACTED] with pertinent CT statutory sections for [REDACTED] and add citation to Supreme Court decision in Liu v SEC re disgorgement as an equitable remedy	2.50	565.00	1412.50
10/30/21	Goldman	Complete preparation of evidentiary excerpt for reply to oppositions to stay motions and circulate to working group	2.00	565.00	1130.00

Fees**\$34,013.00****Professional Summary**

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Irve J. Goldman	Partner	60.20	565.00	34,013.00
Fees				\$34,013.00
Total Fees				\$34,013.00
Total Disbursements				\$0.00

Total Due This Invoice**\$34,013.00**

State of Washington
Consumer Protection Division
ATTN: Tad Robinson O'Neill, Asst. Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188

December 13, 2021
Invoice # 386389
Matter # 082754.0001

**Re: Joint Representation in Appeal of Chapter 11 Confirmation
Order in re: Purdue Pharma L.P., et al.**

For services rendered through November 30, 2021

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/04/21	Goldman	Zoom meeting with States Group re appellate procedure/strategy	0.50	565.00	282.50
11/04/21	Goldman	Receipt/review of email from WA appellate team re basis of indemnification claims and eligibility of trusts; locate limited partnership agreements, Purdue bylaws and pertinent indemnification statutes under NY law and recent decision on eligibility of business trust to file bankruptcy and forward with explanatory email to Tera Heintz and Matt Gold	1.20	565.00	678.00
11/10/21	Goldman	Teams meeting with Clare Kindall and Matt Fitzsimmons regarding briefing/argument issues; Teams meeting with States group, UST, USPOJ, and Canadians regarding argument allocation and other appellate issues (1.20); Teams meeting with Clare Kindall regarding appellate issues, preparing for argument (.30); locate/provide e-mail and information regarding subject matter jurisdiction and in re Sun Edison decision (.50)	2.00	565.00	1130.00
11/12/21	Goldman	Review of States' appellate brief and categorize topics/issues in preparation for conference with Clare Kindall on allocating argument time; Teams meeting with Clare Kindall re argument segmentation and allocation (.5); Teams meeting with Matt Gold re status of appeal, issues and strategy	2.80	565.00	1582.00

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Joint Representation in Appeal of Chapter 11 Confirmation
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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		(.8)			
11/15/21	Goldman	Zoom meeting with WA appellate team and Clare Kindall re oral argument and briefing	0.70	565.00	395.50
11/15/21	Goldman	Review of MD Appellate Brief in preparation for Zoom meeting with State group re briefing and argument (1.0); Participate in State group Zoom meeting re briefing/argument issues (1.0); draft and transmit email to associate re research project concerning right of indemnity for police power claims asserted by state governments (.3)	2.30	565.00	1299.50
11/16/21	Riel	Begin research on the enforceability of indemnification/contribution agreements for violations of consumer protection laws to utilize within reply brief	3.30	325.00	1072.50
11/16/21	Goldman	Review of appellee briefs on best interest test, locate and provide authorities and case excerpts to Clare Kindall for draft reply, review of and make comments to draft reply of statutory interpretation argument	5.00	565.00	2825.00
11/17/21	Goldman	Prepare excerpt for best interest argument in reply (3.0); Teams meeting with Matt Gold, Clare Kindall and Matt Fitzsimmons re call with US DOJ re [REDACTED] (.7); Zoom meeting with US Government attorneys re same (.5); telephone conference Clare Kindall re organization for briefing (.3); Revise, supplement and finalize best interests excerpt for reply brief (2.0)	6.50	565.00	3672.50
11/17/21	Riel	Additional research on the enforceability of indemnification/contribution agreements for violations of consumer protection laws to utilize within reply brief and draft memorandum regarding same	0.70	325.00	227.50
11/18/21	Goldman	Telephone conference with Matt Fitzsimmons re adding footnote to best interest excerpt re [REDACTED]; finalize best interests excerpt and circulate to State group (.5); Teams meeting with CA Asst AG, Clare Kindall and Matt Fitzsimmons re subject matter jurisdiction argument	6.50	565.00	3672.50

Joint Representation in Appeal of Chapter 11 Confirmation
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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		(.5); locate, gather and review declarations and citations to trial exhibits in Debtors' brief re indemnification and insurance rights, DelConte trial testimony and exhibit to Shareholder Settlement Agreement with named releasees and review Dunaway decision and other select decisions for subject matter jurisdiction argument (5.0)			
11/18/21	Riel	Continue research on the enforceability of indemnification/contribution agreements for violations of consumer protection laws to utilize within reply brief and draft memorandum regarding same	2.80	325.00	910.00
11/19/21	Goldman	Receipt and review of Matt Gold comments to best interest excerpt, confer with Clare Kindall re same and receipt/review of finalized version for circulation to incorporate into consolidated reply brief; Teams meetings and communications concerning retention of subject matter jurisdiction argument and work throughout day on subject matter jurisdiction excerpt for consolidated reply brief	6.50	565.00	3672.50
11/20/21	Goldman	Review of WA draft of consolidated reply brief, check select citations for certain propositions, and add comments and suggested revisions; review of WA edits and DE and VT comments to best interest excerpt and incorporate with modifications; Teams meeting with Clare Kindall and Matt Fitzsimmons re: reply brief edits, best interests edits and subject matter jurisdiction excerpt and work throughout day completing subject matter jurisdiction excerpt	9.50	565.00	5367.50
11/21/21	Goldman	Review of and address additional edits to best interests excerpt; Teams meeting with Clare Kindall and Matt Fitzsimmons re: status of reply brief excerpts and how to finalize, review of Matt Gold comments to subject matter jurisdiction excerpt, incorporate with comments from Clare Kindall, prepare reply to Matt Gold comments and otherwise finalize excerpt	2.50	565.00	1412.50
11/22/21	Goldman	Review of first draft of final consolidated reply brief and make comments, continuous review of	6.00	565.00	3390.00

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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		various interactive versions of reply brief and edits thereto and discussions and email correspondence throughout day with WA and CT teams concerning finalizing reply brief			
11/23/21	Goldman	Review of appellate memoranda and key case authorities to prepare for moot court session for SDNY oral argument and prepare list of questions and answers for moot session; participate in moot session with WA/CT team, Brian Edmonds, and others	7.00	565.00	3955.00
11/24/21	Goldman	Revise questions and answers prepared for moot session and forward to Clare Kindall	0.50	565.00	282.50
11/24/21	Goldman	Review of Fusion Connect, garner and Hessler decisions and draft and transmit email to Noah Purcell, et al re 523(a)(2)(A) and 523(a)(7) (1.0); prep Teams meeting session with Clare Kindall and Matt Fitzsimmons	2.00	565.00	1130.00
11/26/21	Goldman	Field questions throughout afternoon from Clare Kindall re locating various release-related provisions in record/plan/pleadings (2.5); review of and digest Judge McMahon list of questions for briefing and argument and begin to look into/address questions (2.0)	4.50	565.00	2542.50
11/27/21	Goldman	Teams meeting with Clare Kindall and Matt Fitzsimmons re briefing questions posed by Judge McMahon and indemnity and contribution issues under CT law; exchange of emails throughout day with Clare Kindall and Matt Fitzsimmons re same and locate research assistance with P&C on state law questions (2.5); locate pleadings, orders and case authority on Section 1141(d)(6) nondischargeability issue and issue of whether Judge McMahon could affirm if [REDACTED] [REDACTED] and draft and transmit email to working group re same (1.5); Zoom meeting with WA and State Group re addressing Judge McMahon questions (.5); Teams meeting with P&C team, Clare Kindall and Matt Fitzsimmons re research project (.5); telephone conference with Matt Gold re indemnification documents, receipt/review of email from Matt Gold re same and locate and provide	6.00	565.00	3390.00

Joint Representation in Appeal of Chapter 11 Confirmation

Order in re: Purdue Pharma L.P., et al.

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December 13, 2021

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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		11/19/04 indemnification provisions approved by Purdue Pharma, LP and referenced in Limited Partnership Agreement (.5); locate and provide insurance policies and memo re same to Brian Edmunds (.5)			
11/28/21	Goldman	Review of email from Tera Heintz and [REDACTED] case re [REDACTED] draft and transmit responsive email (1.8); telephone conference with Robert Tuchman re looking at indemnification under CPA and NY law per Purdue bylaws (.2); telephone conference with Johanna Katz re addressing Question 14 of Judge's questions (.3); review of and note comments to P&C team excerpts for Judge's questions on state law of indemnity and contribution (1.0); Teams meeting with Clare Kindall, Matt Fitzsimmons and P&C team re pulling together state law excerpt (.5); work throughout day on finalizing state law excerpt and addressing certain other of Judge's questions (3.0); review of Robert Tuchman email re indemnification under Purdue LPA and bylaws (.2)	6.00	565.00	3390.00
11/28/21	Goldman	Receipt/review of email from Tera Heintz re indemnification and insurance documents, locate all applicable indemnification and insurance documents and forward same to Tera Heintz with explanatory email	1.00	565.00	565.00
11/29/21	Goldman	Prepare for second moot court session at Kleinberg Kaplan, travel to NYC and participate in moot court session, work throughout day on finalizing supplemental brief ordered to be filed by Judge McMahon, researching select appellate issues likely to come up and analyzing and discussing same with Matt Gold, Clare Kindall and Noah Purcell (8.5 hrs)	8.50	565.00	4802.50
11/30/21	Goldman	Attend oral argument on appeal of confirmation order and post-argument discussion/analysis with Clare Kindall and Matt Gold re: outcome of argument and Judge's questions and comments and issues to address and strategy post-argument	8.00	565.00	4520.00

Fees**\$56,167.50**

Joint Representation in Appeal of Chapter 11 Confirmation
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Professional Summary

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Irve J. Goldman	Partner	95.50	565.00	53,957.50
Nicole M. Riel	Associate	6.80	325.00	2,210.00
	Fees			\$56,167.50

Disbursements

	Amount
External Telephone Charge	18.81
Total Disbursements	\$18.81
Total Fees	\$56,167.50
Total Disbursements	\$18.81
Total Due This Invoice	\$56,186.31

State of Washington
Consumer Protection Division
Attn: Tad Robinson O'Neill, Asst. Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188

January 11, 2022
Invoice # 387308
Matter # 082754.0001

**Re: Joint Representation in Appeal of Chapter 11 Confirmation
Order in re: Purdue Pharma L.P., et al.**

For services rendered through December 31, 2021

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/01/21	Goldman	Receipt/review of and make revisions to email from Matt Gold re recap of post-argument conversation with Marshall Huebner and Marc Kesselman (.3); receipt/review of Judge McMahon's order re post-argument briefing and telephone conference with Matt Gold re same (.7); conference call with US Trustee team re coordinating briefing (.8); telephone conference with Matt Gold re settlement Teams meeting at 8:30 p.m. (.2)	2.00	565.00	1130.00
12/02/21	Goldman	Review of select portions of argument transcript, review of Matt Gold email re Judge McMahon's order on supplemental briefs and draft and transmit email providing comments/suggestions for brief (1.0); Teams meeting with State group re content and timing of supplemental brief (.7)	1.70	565.00	960.50
12/02/21	Goldman	Telephone conference with Matt Gold re jurisdictional/Stern v. Marshall issue for post-argument brief	0.50	565.00	282.50
12/03/21	Goldman	Review of draft of post-argument brief, locate case authorities to support suggested changes/additions, make changes/additions and circulate to working group (3.5); review of and respond to email of Clare Kindall re likely scenarios post-ruling of Judge McMahon (.3)	3.80	565.00	2147.00

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Joint Representation in Appeal of Chapter 11 Confirmation
Order in re: Purdue Pharma L.P., et al.

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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/04/21	Goldman	Review of post-argument brief circulated by WA and certain cited exhibits and provide marked comments	1.30	565.00	734.50
12/05/21	Goldman	Review of various iterations of excerpt on advising Judge McMahon of effective date/sentencing deadlines; draft and transit email to Clare Kindall re explanation of relation of sentencing date to Effective Date and other provisions of Judge Drain's stay order, locate/consult plea agreement and plan section on Effective Date; draft and circulate comments to stay excerpt of post-argument brief; Teams meeting with Clare Kindall and Matt Gold re resolving remaining issues for excerpt	2.50	565.00	1412.50
12/10/21	Goldman	Teams meeting with States' Group re prognosis for further proceedings after Judge McMahon ruling (.5); post-Teams meeting with Clare Kindall re issues/strategy (.3)	0.80	565.00	452.00
12/16/21	Goldman	Review of Judge McMahon's decision and ruling on appeal	3.50	565.00	1977.50
12/17/21	Goldman	Locate/review case authorities re whether vacatur of confirmation order by district is directly appealable as a final order (1.0); Zoom hearing with State Group re implications and questions concerning Judge McMahon's Decision and Order (1.0)	2.00	565.00	1130.00
12/20/21	Goldman	Receipt/review of Tobak email re Purdue seeing interlocutory appeal and soliciting appellees' non-objection (.2); locate/review additional authority re interlocutory nature of district court's vacating of bankruptcy court confirmation order (.8); draft and transmit emails to State Group re responding to Purdue request and interlocutory order issue (.4); Teams meeting with Clare Kindall and Matt Fitzsimmons re appellate issues/strategy (1.2); telephone conference with Matt Gold re same (.4)	3.00	565.00	1695.00
12/20/21	Goldman	Review of and respond to US Trustee and Jill Abrams' email re thoughts on Purdue's request for consent on non-objection to interlocutory appeal	0.50	565.00	282.50
12/21/21	Goldman	Conference call with Bill Harrington and US Trustee team, Matt Gold, Brian Edmunds and Allen Underwood re issues/strategy re Judge McMahon decision, appellate issues and	1.20	565.00	678.00

Joint Representation in Appeal of Chapter 11 Confirmation
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Invoice No.: 387308

January 11, 2022

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<u>Date</u>	<u>Professional</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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extension of preliminary injunction

Fees

\$12,882.00

Professional Summary

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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Irve J. Goldman

Partner

22.80

565.00

12,882.00

Fees

\$12,882.00

Disbursements

Amount

Travel and related expenses

107.31

Total Disbursements

\$107.31

Total Fees

\$12,882.00

Total Disbursements

\$107.31

Total Due This Invoice

\$12,989.31

The Committee of Participating States
c/o Office of the Attorney General, State of Connecticut
Attn: Matthew Fitzsimmons, Esq., AAG
165 Capitol Avenue
Hartford, CT 06106

February 7, 2022
Invoice # 388279
Matter # 082754.0003

Re: Purdue Pharma Post-Appeal Matter

For services rendered through January 31, 2022

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/18/22	Goldman	Telephone conference with Matt Gold re issues raised by Purdue mediation presentation	0.40	565.00	226.00
01/27/22	Goldman	Teams meeting with VT and DE AGs and Assistant AGs and Purdue representatives re structuring settlement and preparing preliminary settlement agreement (2.0); Teams meeting with VT, DE, RI and CT representatives re outcome of 1/26 Teams meeting and outcome of Teams meeting with Purdue on 1/27 and issues and strategy in structuring settlement (.5) Teams meeting with Matt Fitzsimmons and Clare Kindall re same (.3)	2.80	565.00	1582.00
01/27/22	Goldman	Conference call with Jimmy Rock, Wendy Weinstein and Kathleen Konopka re alternative of lifting preliminary injunction for nine appellee states	0.50	565.00	282.50

Fees **\$2,090.50**

Professional Summary

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Irve J. Goldman	Partner	3.70	565.00	2,090.50

Fees **\$2,090.50**

Connecticut law requires us to advise you that this communication is an attempt to collect a debt.

Total Fees	\$2,090.50
Total Disbursements	\$0.00
Total Due This Invoice	\$2,090.50

The Committee of Participating States
c/o Office of the Attorney General, State of Connecticut
Attn: Matthew Fitzsimmons, Esq., AAG
165 Capitol Avenue
Hartford, CT 06106

March 14, 2022
Invoice # 390107
Matter # 082754.0003

Re: Purdue Pharma Post-Appeal Matter

For services rendered through February 28, 2022

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/18/22	Goldman	Participate in Purdue mediation presentation	1.00	565.00	565.00
01/26/22	Goldman	Teams meeting with AGs from VT, MD, DE, RI, DC and OR re settlement term sheet/preliminary settlement agreement	1.50	565.00	847.50
02/03/22	Goldman	Telephone conference with Marshall Huebner re intended settlement structure and timing of same	0.50	565.00	282.50
02/04/22	Goldman	Review of settlement term sheet (.5); locate/review decisions on enforceability of confession of judgment if NY choice of law provision is in agreement and locate/review decisions on divestiture rule where lower court ruling is on appeal (1.0); Teams meeting with AG representatives of Participating States re comments to term sheet (1.3); incorporate comments discussed in Teams meeting into term sheet and circulate to Participating States (1.2); receive additional comments from Participating States and incorporate into revised term sheet and circulate (.5)	4.50	565.00	2542.50
02/04/22	Goldman	Receive/review further additional comments to revised settlement term sheet, incorporate into final revised version and circulate	1.00	565.00	565.00
02/06/22	Goldman	Telephone conference with Eli Vonnegut re Purdue/Sackler changes to revised settlement term sheet proposed by Appellee States (.7);	3.30	565.00	1864.50

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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Teams meeting with Participating States re Prudential/Sackler comments/changes to States' revised settlement term sheet, review of Purdue/Sackler revised version of settlement term sheet and reconvene Teams meeting with Participating States (1.3); draft revisions to Purdue/Sackler revised settlement term sheet and circulate (.8); review of and respond to follow-up questions from Jill Abrams (.3); Teams meeting with AG Tong, Marc Kesselman, Eli Vonnegut, Deputy AG and Matt Fitzsimmons, [REDACTED] [REDACTED] (.5)			
02/06/22	Goldman	Review emails exchanges and comments/questions re States' marked-up term sheet and provide replies to questions (.6); Teams meeting with Jill Abrams, Kate Sabatini, Marion Buirk, Omar Lefkon, David Hart, Adi Goldstein re further comments to term sheet, incorporate comments and circulate draft (.9)	1.50	565.00	847.50
02/07/22	Goldman	Receipt/review of CA comments to term sheet and draft and transmit my replies per request of Kate Sabatini (1.2); telephone conference with Eli Vonnegut re requirement of final non-appealable orders and draft and transmit email to group re summary of call (.8)	2.00	565.00	1130.00
02/07/22	Goldman	Teams meeting with Jill Abrams, Marion Quirk, Kate Sabatini, Matt Fitzsimmons and Peggy Chapple re comments to term sheet, CA comments, and final non-appealable order requirement (.5); telephone conference with Eli Vonnegut re resolving issues with term sheet, other deal issues (.5); draft and transmit email to group re my call with Eli (.4)	1.40	565.00	791.00
02/07/22	Goldman	Telephone conference with Jill Abrams re status of discussions/comments to term sheet (.3); review of Purdue comments/changes in response to CA proposed revisions (.4)	0.70	565.00	395.50
02/07/22	Goldman	Teams meeting with participating states re various versions of settlement term sheet circulated by Purdue and CA, work through responsive revisions and draft several iterative versions and final version for circulation to Purdue/Judge Chapman; Teams meeting with Marshall Huebner, Marc Kessleman, Jill	2.50	565.00	1412.50

Purdue Pharma Post-Appeal Matter

Invoice No.: 390107
March 14, 2022
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<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Abrams, Marion Quirk, Kate Sabatini and Kate Knopka re footnote 4 and other term sheet issues (.5)			
02/07/22	Goldman	Receipt/review of final term sheet circulated by Purdue, mark suggested revisions and Teams meeting with participating states re final term sheet (1.0); Teams meeting with Participating States, Judge Chapman and Purdue Attorneys re comments on final term sheet and post-meeting discussion with Participating States (1.0)	0.30	565.00	169.50
02/08/22	Goldman	Telephone conference with Matt Fitzsimmons re final term sheet and change to [REDACTED] and how to proceed post-settlement term sheet	0.60	565.00	339.00
02/08/22	Goldman	Telephone conference with Matt Fitzsimmons re final term sheet and change to [REDACTED] and how to proceed post-settlement term sheet	0.60	565.00	339.00
02/25/22	Goldman	Review of WA mark up of settlement term sheet (.8); Teams meeting with States' group re marked up term sheet and issues re same (.4)	1.20	565.00	678.00
02/25/22	Goldman	Telephone conference with Marshall Huebner re WA term sheet and issues/approach for finalizing settlement (.5); draft and transmit email to group re outcome of call with Marshall Huebner (.2)	0.70	565.00	395.50
02/26/22	Goldman	Telephone conference with Matt Gold re timing of finalizing term sheet and getting papers on file with Bankruptcy Court (.3); review of February 26, 2022 marked term sheet circulated by Purdue and make suggested revisions/comments and circulate to group (1.2); review of and exchange of email correspondence with group re revision to [REDACTED] and responding to Matt Gold and draft email to Matt Gold re meeting tonight at 8 pm with Judge Chapman (.5); telephone conference with Eli Vonnegut re our comments to term sheet and email group re outcome of conversation (.5)	2.50	565.00	1412.50
02/27/22	Goldman	Review of updated term sheet circulated by Davis Polk (.3); Teams meeting with States' group, Judge Chapman and Davis Polk re finalizing term sheet and other settlement/logistical issues (1.0); follow up call with Matt Gold re status of WA position on term sheet (.2); receipt and	5.50	565.00	3107.50

<u>Date</u>	<u>Professional</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		review of motion to approve term sheet and proposed order and note comments (.5); communicate with Matt Fitzsimmons re [REDACTED] and telephone conference with Eli Vonnegut re same and re filing motion to excuse filing brief in Second Circuit (.5); receive/review updated marked term sheet and participate in 8 pm Teams meeting (1.2); further review/study of latest revised term sheet and conduct Teams meeting with group (.8); 11:45 Teams meeting with States Group, Judge Chapman and Davis Polk (1.0)			
02/27/22	Goldman	Conference call with Davis Polk, CA, RI, Judge Chapman, Matt Gold and Jeff Rupert re [REDACTED] language and other remaining issues to term sheet (1.3); Teams meeting with States Group, Judge Chapman and Davis Polk re outcome of conference call with WA et al and remaining logistical issues (.5); Teams meeting with States Group to discuss logistical language changes (.5)	2.30	565.00	1299.50
02/28/22	Goldman	Work throughout day up until 2 am reviewing various iterations of settlement term sheets, revising term sheets, exchanging email with States Group and other settlement parties, conducting Teams meetings with States Group throughout day, participating in Teams meetings with Judge Chapman, Eli Vonnegut, Marshall Huebner and States Group and ending Teams meeting with States Group re finalizing open issues	13.00	565.00	7345.00

Fees **\$26,329.00**

Professional Summary

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Irve J. Goldman	Partner	46.60	565.00	26,329.00

Fees **\$26,329.00**

Total Fees **\$26,329.00**
Total Disbursements **\$0.00**

Total Due This Invoice **\$26,329.00**